

January 6, 1987

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MEMORANDUM FOR: Victor Stello, Jr.
Executive Director for Operations

FROM: Harold K. Denton, Director
Office of Nuclear Reactor Regulation

SUBJECT: CLOSE-OUT OF THE DIVISION OF HUMAN FACTORS TECHNOLOGY
TMI ACTION PLAN ITEMS

As part of G. Messenger's 100 percent audit of human factors generic safety issues, several TMI Action Items were identified that had been completed or for which no further action was required, which had not been formally closed per the June 3, 1981 memorandum from the EDU to the Office Directors. This is to formally document the close-out of the following Division of Human Factors Technology TMI Action Plan Items. The items are discussed in detail in the enclosure.

<u>TMI ACTION PLAN ITEM</u>	<u>SHORT TITLE</u>
I.A.1.4	Long-Term Upgrading of Operating Personnel
I.A.2.3	Administration of Training Programs
I.A.2.4	NRK Participation in Inspector Training
I.A.3.2	Operator Licensing Program Changes
I.A.3.3	Requirements for Operator Fitness
I.B.1.1 (1-4)	Organization and Management, Long-Term Improvements
II.J.3.1	Organization and Staffing to Oversee Design and Construction
II.J.3.2	Issue Regulatory Guide on Management for Design and Construction
II.K.3(55)	Operator Monitoring of Control Board
II.K.3(56)	Simulator Training Requirements

*II.K.3-5
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Victor Stello

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Revisions for SIMS have been prepared and submitted which reflect the status of the items described above.

Original Signed by
H. R. Denton

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosure:
As stated

JWP/CLOSEOUT OF TMI AC LANS

HFIB:BC DBJones 12/15/86
HEDO:SAK GMessenger 12/12/86
HFDO:DD BABoger 12/12/86

OFFICE	HFIB	HEDO	SPEB	SADD	SADD	SADD	NRRO
SURNAME	JWP	WTRussell	KKnie1	BSheran	ISpols	SMoller	HRDenton
DATE	12/10/86	12/12/86	12/19/86	12/19/86	12/22/86	12/5/87	12/10/86

ENCLOSURE

CLOSE-OUT OF DHFT ACTIVITIES FOR TMI ACTION ITEMS

1.A.1.4 Long-Term Upgrading of Operating Personnel

This action item provided for changes to 10 CFR 50 concerning plant staffing, including shift manning, control room presence, and shift working hours.

This item was resolved by the Commission approving, on April 28, 1983, the final rule (10 CFR 50.54) submitted in SECY 83-52A.

1.A.2. Administration of Training Programs

This action item required that:

1. NRR audit training programs to assure training is formalized and eventually in conformance with accreditation;
2. NRR conduct cold operator licensing certification at simulators; and
3. Pending accreditation, NRR require certain instructors to be SRO certified.

Elements 2 and 3 have been implemented for some time and have been incorporated into the Examiner Standards and Inspection Procedures. The issue of training audits has been addressed by the Commission's "Policy Statement on Training and Qualification of Nuclear Power Plant Personnel," 50 FR 11147, which endorses the INPO managed accreditation program. Hence, actions to resolve this issue are complete.

I.A.2.4 NRR Participation in Inspector Training

This item provided for operator licensing and human factors personnel in NRR to provide instruction in the IE Inspector Training Program on the role and licensing of reactor operations staff.

This item was completed in September 1983 by the regionalization of the operator licensing function which provided for training and guidance of the regional operator licensing personnel.

I.A.3.2 Operator Licensing Program Changes

This action item provided for the development and implementation of a plan to relocate operator licensing branch examiners to Nuclear Power Plant Simulator Training Centers or in the IE regions.

This action item was completed by the regionalization of operator licensing activities in FY 1983 and by the issuance of NUREG-1021, "Operator Licensing Examiner Standards."

I.A.3.3 Requirements for Operator Fitness

A regulatory approach was to be developed for Commission consideration to provide assurance that applicants for operator and senior operator licenses are psychologically fit (stress and malice), and to prohibit licensing of persons with histories of drug and alcohol abuse or with histories of criminal backgrounds.

The Commission Policy Statement of July 30, 1986, "Fitness for Duty of Nuclear Power Plant Personnel," 51 FR 27921-27923

recognizes industry efforts in establishing fitness for duty programs. Hence, activities to resolve this action item are complete.

1.8.1.1 Organization and Management, Long-Term Improvements
(1-4)

This item provided for the development of criteria for onsite and offsite organizations, both management and technical, including the radiological protection organization, that will assure the safe operation of the plant during normal and abnormal conditions and the capability necessary to respond to accident situations.

This item was composed of seven tasks:

1. Preparation of draft criteria;
2. Preparation of a Commission Paper to issue the criteria to operating plants;
3. Issue requirements to the licensees for upgrading of management and technical resources;
4. Review licensee responses to determine acceptability;
5. IE to review licensee implementation of upgrading activities;
6. Prepare proposed revisions to Regulatory Guides 1.33 and 1.8; and
7. Issue revised Regulatory Guides 1.33 and 1.8.

The NRC is moving toward performance-based rather than prescriptive regulation (1986 Policy and Planning Guidance - NUREG-0685). The NRC is approaching Management and Organization by improving its responsiveness to licensee performance, e.g., SALP improvement. The Nuclear Utility Management and Resources Committee (NUMARC) was established by the industry in March 1984 with an objective of reviewing management and people-related issues in nuclear operations and developing industry-wide resolutions.

The Commission has responded to NUMARC initiatives in a positive manner. In a letter dated January 23, 1985 to J. H. Miller, Chairman of NUMARC, Chairman Palladino supported initiatives which include improvement in management and organization and stated, in part, "--- we strongly encourage industry efforts to enhance the performance of utility corporate management."

Based upon industry initiatives and the Commission's policy guidance, work on Tasks 1 through 4 of this issue have been terminated. Thus, work on this portion of the issue is complete.

It should be noted that Part 5 of this item is considered closed in that IE routinely develops inspection procedures which address new or revised requirements.

In parts 6 and 7 IE now has the responsibility for Regulatory Guide 1.33 and NRR has the responsibility for Regulatory Guide 1.8. The NRR portion of Items 6 and 7 (Regulatory Guide 1.8) will be complete upon Commission approval of SECY 86-348, "Final Rulemaking for Revisions to Operator Licensing - 10 CFR 50 and Conforming Amendments."

11.J.3 Management for Design and Construction

11.J.3.1 Organization and Staffing to Oversee Design and Construction

11.J.3.2 Issue Regulatory Guide

Item 11.J.3.1 was to provide for the development of criteria requiring license applicants and licensees to improve oversight of design, construction, and modification activities so that they will gain the critical expertise necessary for the safe operation of the plant. Item 11.J.3.2 provided for the issuance of a regulatory guide that codifies the requirements for technical resources and controls during the design, construction, and modification stages.

This criteria was to be developed in conjunction with I.B.1.1. The Commission policy guidance in support of NUMARC which resolves I.B.1.1 (1-4) also closes this issue.

11.K.3(55) Operator Monitoring of Control Board

This action item, applicable to only Westinghouse and Combustion Engineering (CE) units, consisted of Action Items I.C.1, I.D.2, and I.D.3. Item I.C.1 and I.D.2 are complete. The open portion of this action item will be resolved with the resolution of Item I.D.3 which remains open and is separately being tracked. Hence, this action item, 11.K.3(55), can be closed.

11.K.3(56) Simulator Training Requirements

This action item, applicable to only Westinghouse and CE units, consisted of Action Items I.A.3.1 and I.A.2.6. Item I.A.3.1 is

complete. The open portion of this action item will be resolved with the resolution of Item I.A.2.6 which remains open and is separately being tracked. Hence, this action item, II.K.3(55), can be closed.