



Duquesne Light

Nuclear Division
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August 10, 1982

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Attn: Mr. R. C. Haynes, Regional Administrator
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
NRC Inspection 81-16 - Additional Information

Gentlemen:

This letter documents telephone conversations between Mr. T. T. Martin of your office and Mr. J. D. Sieber of my office clarifying the Company's response to Violation B of NRC Inspection 81-16 as set forth in our January 12, 1982 letter. Additional information was requested regarding the manner in which the on-the-job training program modifications identified in the "action to prevent recurrence" satisfies the requirements of ANSI N18.1-1971.

By internal letter dated August 24, 1981 (Attachment A), an "Employee Qualification Statement", along with instructions for its use, was prepared. This "Employee Qualification Statement" was designed to satisfy Section 5.6 of ANSI N18.1-1971 which requires that "records of the qualifications, experiences, training and retraining of each member of the plant organization should be maintained".

On May 5, 1982, a new procedure (Attachment B) was made effective in the Station Administrative Procedures (SAP-15) which requires a special written evaluation of an employee following an incident which is considered to demonstrate either outstanding or unsatisfactory performance. All members of the station staff are evaluated on an annual basis. This comprehensive evaluation of job performance was designed to reveal not only defects in the training program but also many other factors considered by us to be valuable in managing the work force. SAP-15 requires the Director of Nuclear Division Training to modify the training programs to correct group deficiencies or trends identified to him

by the various group supervisors. This evaluation procedure was implemented in addition to other Corporate rating and deficiency documentation systems which have been in use for a number of years and which yield similar information. We believe that the use of SAP-15 satisfies the requirements of ANSI N18.1-1971, Section 5.5 which requires that a "means should be provided in the training programs for appropriate evaluation of its effectiveness".

In reviewing the records related to this action to prevent recurrence, we concluded that additional improvements could be made to the on-the-job training program to more closely meet the requirements of ANSI N18.1-1971. A Standing Operating Order containing the text provided as Attachment C to this letter has been issued. This Standing Operating Order will be incorporated into the Operating Manual, Chapter 48, Section 4, "Qualification Of Operating Personnel", by September 1, 1982. This order provides the following additional assurances of compliance:

- 1) Makes mandatory the use of qualified personnel
- 2) Sets controls on and documents the content of the training
- 3) Provides a qualitative assessment of the effectiveness of the training before the trainee is allowed to perform the task without direct supervision
- 4) Requires a review by the Nuclear Training Section which will permit the evaluation of the adequacy of training being conducted by this method.

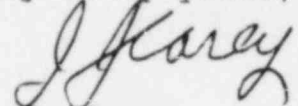
We have also noted that editorial changes to Paragraph V - Section I of SAP-15 are needed to clarify the intent of that section.

It is not our intent to utilize on-the-job training as the major basis for overall qualification of operating personnel. This program is intended to be used to train operations personnel to perform relatively simple tasks under situations where formally trained personnel are not available. We believe that these methods meet the requirements of ANSI N18.1-1971 and will provide a satisfactory amount of training so that the related tasks can be accomplished in a safe manner.

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Should you have any further questions, do not hesitate to contact me.

Very truly yours,



J. J. Carey
Vice President - Nuclear

Attachments

cc: Mr. W. M. Troskoski, Resident Inspector
U. S. Nuclear Regulatory Commission
Beaver Valley Power Station
Shippingport, PA 15077

U. S. Nuclear Regulatory Commission
c/o Document Management Branch
Washington, D. C. 20555

August 24, 1981
MNS:024

Training on Shift

Mr. T. D. Jones:

Trainees assigned to plant operations for on-the-job training in preparation for licensing or qualification as "Auxiliary" Operators, should normally not be used as operators during the training period. In the event that they are required to perform certain functions, the trainee may be instructed on-shift, provided the training received is documented, utilizing the Employee Qualification Statement, Figure 0.2.

The sheet shall identify the portion of or component in the system in which training was provided, the student's name, the date, and a brief description of the training received. A licensed operator/supervisor's signature is required, noting the trainee is qualified to perform the task. A Training Instructor will review the Checkoff Sheet and also sign the form.

I believe the above addresses areas of concern noted in our discussion on August 18.


F. J. Bissert

Attachment

cc: J. V. Vassello

DUQUESNE LIGHT COMPANY
Beaver Valley Power Station
Training Manual

Fig. 0.2

ATTACHMENT "A"
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EMPLOYEE QUALIFICATION STATEMENT

Employee Name/Number	Course Title (1)	Completion Date
Employee Job Title	Ralph Code	

Description of Instruction: (1)

Description of Tasks: (1):

Reason/Requirement for Instruction:

This qualification is conditional and limited by the following waivers or physical limitations. (If no restrictions, state "None")

Employee qualified to perform specific tasks noted above. Supportive documentation attached.

cc: Manager Nuclear Operators
Manager Nuclear Support Services
Individual Staff Supervisor

Signature of NSS, NSOF, or
Person Responsible for Trng.

Reviewed: _____
Supervisor of Training

(1) If course or training is not described in TM-1, a description of instruction completed must be provided under "Description"

LIST OF EFFECTIVE PAGES

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1	1	5/21/82			
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3	1	5/21/82			
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5	1	5/21/82			
6	1	5/21/82			
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EVALUATION OF JOB PERFORMANCE

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EVALUATION OF JOB PERFORMANCEI. PURPOSE

The purpose of the Evaluation of Job Performance is to:

1. Provide for periodic evaluation of station Testing and Plant Performance, Maintenance, Instrumentation and Control, and Operations personnels performance in relationship to specific job related standards.
2. Provide a means for objective feedback on job performance to management.
3. Provide for accumulation of data for use in determining individual and group deficiencies, strong points and knowledge and attitude trends. This data will be incorporated into training, and/or in an immediate on shift correction of an identified deficiency.

II APPLICABILITY

This evaluation is to be used by the Testing and Plant Performance Supervisor, the Operations Supervisor, the Instrument and Control Supervisor, Maintenance Supervisor, and all designated subordinates in performing evaluations of all personnel under their responsibility.

III. FREQUENCY

The Evaluation of Job Performance is to be performed for each applicable employee at a minimum annually, and should be performed in the event of an individuals involvement in a Critical Incident as defined in Section IV of this chapter.

IV. DEFINITIONSA. Evaluation of Job Performance

A standard process used to analyze a series of documented subjective evaluations and to arrive at an objective indicator of an employees performance level.

B. Quality of Work

The nature or character of an individuals performance.

EVALUATION OF JOB PERFORMANCE (Continued)

ATTACHMENT "B"

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C. Quantity of Work

The amount or number of projects, operations or evolutions an individual may be involved with.

D. Job Knowledge

The familiarity, awareness, or understanding of job related projects, operations or evolutions, possessed by an individual, gained through experience or study.

E. Critical Incident

An action, either taken, or not taken by an individual which illustrates either outstanding or unsatisfactory job performance.

V. RESPONSIBILITIESA. Operations Supervisor (Supervisor Nuclear Station Operations)

The Operations Supervisor is responsible to the Station Superintendent for ensuring that annual Evaluations of Job Performance are conducted for each person assigned to the Plant Operations Group. He personally conducts evaluations of those individuals assigned as Shift Supervisors (Nuclear), Radioactive Waste Disposal Coordinator, Operations Support Coordinator, and in turn assigns appropriate subordinates for the performance of evaluations for the remainder of the Operations Group. He will review the results of all evaluations performed.

The Operations Supervisor additionally is responsible to ensure any group deficiencies or trends are identified to the Director of Nuclear Training Division for specific upgrading program incorporation into the requalification program.

B. Operations Support Coordinator

The Operations Support Coordinator is responsible to the Operations Supervisor for the collection of completed Evaluations of Job Performance, and appropriate distribution and filing of the evaluations in accordance with prevailing company policy. He will maintain a supply of Evaluation of Job Performance forms for issue to applicable persons upon request.

C. Maintenance Supervisor

The Maintenance Supervisor is responsible to the Station Superintendent for ensuring that annual Evaluations of Job Performance are conducted for each person assigned to the Maintenance Group. He personally conducts evaluations of those individuals assigned as the Senior Mechanical Maintenance Engineer, the Senior Electrical Maintenance Engineer, the Maintenance Support Coordinator and in turn assigns appropriate subordinates for the performance of evaluations for the remainder of the Maintenance Group.

The Maintenance Supervisor additionally is responsible to ensure any group deficiencies or trends are identified to the Director of Nuclear Training Division for incorporation in periodic training.

D. Maintenance Support Coordinator

The Maintenance Support Coordinator is responsible to the Maintenance Supervisor for the collection of completed Evaluations of Job Performance and appropriate distribution and filing of the evaluations in accordance with prevailing company policy. He will maintain a supply of Evaluation of Job Performance forms or issue to applicable persons upon request.

E. Supervisor Instrumentation and Controls

The Supervisor of Instrumentation and Controls is responsible to the Station Superintendent for ensuring that annual Evaluations of Job Performance are conducted for each person assigned to the Instrument and Controls Group. He personally conducts evaluations of those individuals assigned as Senior Instrument and Controls Maintenance Engineer, Senior Instrument and Controls Calibration Engineer, Instrument and Control Coordinator, and in turn assigns appropriate subordinates for the performance of evaluations for the remainder of the Instrument and Controls Group. He will review the results of all evaluations performed.

The Supervisor of Instrumentation and Controls additionally is responsible to ensure any group deficiencies or trends are identified to the Director of Nuclear Training Division for specific upgrading program incorporation into the periodic training program.

EVALUATION OF JOB PERFORMANCE (Continued)

ATTACHMENT "B"

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F. Instrumentation and Controls Support Coordinator

The Instrumentation and Controls Support Coordinator is responsible to the Instrumentation and Controls Supervisor for the collection of completed Evaluations of Job Performance and appropriate distribution and filing in accordance with prevailing company policy. He will maintain a supply of Evaluation of Job Performance forms for issue to applicable persons upon request.

G. Supervisor of Testing and Plant Performance

The Supervisor of Testing and Plant Performance is responsible to the Station Superintendent for ensuring that annual Evaluations of Job Performance are conducted for each person assigned to the Testing and Plant Performance Group. He personally conducts evaluations of those individuals assigned as Senior Testing Coordinators, Coordinator of Station Study Projects, and in turn, assigns appropriate subordinates for the performance of evaluations for the remainder of the Testing and Plant Performance Group. He will review the results of all evaluations performed.

The Supervisor of Testing and Plant Performance additionally is responsible to ensure any group deficiencies or trends are identified to the Director of Nuclear Training Division for specific upgrading program incorporation into the periodic training program.

H. Coordinator of Station Study Projects

The Coordinator of Station Study Projects is responsible to the Supervisor of Testing and Plant Performance for the collection of completed Evaluations of Job Performance and appropriate distribution and filing in accordance with prevailing company policy. He will maintain a supply of Evaluation of Job Performance forms for issue to applicable persons upon request.

I. Director of Nuclear Division Training

The Director of Nuclear Division Training is responsible for ensuring group deficiencies or trends identified to him by the various Group Supervisors are incorporated into applicable training programs, or in the case of Operations Group, Operator Requalification Training, as specific upgrading programs.

EVALUATION OF JOB PERFORMANCE (Continued)ATTACHMENT "B"
Page 8 of 14J. Evaluator

The individual assigned by an applicable Group Supervisor is responsible to conduct an Evaluation of Job Performance for the person he has been assigned. He will conduct the evaluation in accordance with this procedure, prepare and process performance ratings sheets (form A and B attached), and will conduct a post evaluation interview with the individual.

VI. REFERENCES

None

VII. INSTRUCTIONSA. General

1. Form A (Attached) is used to record pertinent administrative data, the reason for the evaluation and any comments or recommendations reached as a result of the evaluation.
2. Form B (Attached) provides criteria for evaluation of job performance and specific areas to which these criterion will be applied.

B. Mechanics of Preparing Work Incident Summary (Form A)

1. Fill in the heading of the form as follows:
 - a. Record Employee's Name, Job Title, and Number.
 - b. Record date of work incident. (If evaluation is being performed as a periodic requirement, record N/A).
 - c. Record date of initial evaluation and date the form is prepared.
 - d. Record a brief description of the incident, or reason for this evaluation. (If this evaluation is being performed as a periodic requirement, record "Periodic Review").

C. Mechanics of Preparing the Performance Review (Section B).

1. Fill in the heading of the form as follows:
 - a. Record employee's name and number.
 - b. Record employee's job title, date evaluation is performed, and the name of the individual performing the evaluation.

EVALUATION OF JOB PERFORMANCE (Continued)ATTACHMENT "B"
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2. Fill in the Evaluation Rating as follows:
 - a. Determine the description of behavior most applicable to the area of review in question per the Performance Rating Guide.
 - b. Record this number in the space provided.
 - c. If an explanation of the description selected is necessary, mark the appropriate column and record the comment in Section A beneath the heading "Comments of Review", mark the appropriate column and record explanation in Section A under the heading "Comments."

D. Evaluation Review and Processing

1. Review the comments and overall evaluation with the individual in accordance with Section VII.F of this procedure. This review will include any immediate corrections of identified deficiencies.
2. Sign the Evaluation of Job Performance.
3. Submit the final Evaluation of Job Performance to the applicable Group Support Coordinator.

E. Guidelines for Evaluation of Employee

1. The evaluation should be limited to the time period or incident covered by the rating. It is not good practice to review old evaluation sheets until the current evaluation is complete. The rating should reflect the employees performance for the current period and the evaluators review could be biased by reviewing data from outside the period.
2. The evaluator must employ disciplined thinking so as to rate the employee on each "Area for Review" separately, and not allow his decision on one area sway his decision on others.
3. The evaluator should determine his personal prejudices towards the employee and exercise caution that these prejudices good or bad do not interfere with an objective evaluation of employee.

EVALUATION OF JOB PERFORMANCE (Continued)

4. When determining the description of behavior most applicable the evaluator must bear in mind the employees Quality of Work, Quantity of Work, and Job Knowledge.

F. Guidelines for Review of Evaluation with Employee

1. The review should be conducted in private.
2. The review should be conducted as soon as possible after the evaluation is performed.
3. The evaluator should point out strong points as well as weak areas, and should offer recommendations for improvements in areas identified as needing improvement. He will institute immediate on shift corrective action of any identified deficiency.

EVALUATION OF JOB PERFORMANCE
SECTION A - WORK INCIDENT SUMMARY

NOTE:

Significant work incidents of employees - both satisfactory and unsatisfactory should be recorded as follows:

Employee's Name _____

Job Title _____

Employee No. _____

Date of Work Incident

Date of Talk with Employee

Date of this Report

Description of this significant work incident or review: _____

Comments (Data from talk with employee and special recommendations) _____

NOTE:

Record data of this significant work incident on "Performance Review" report opposite specific job characteristics which are specifically related to this work incident.

Signature of Evaluator

EVALUATION OF JOB PERFORMANCE
SECTION B - PERFORMANCE REVIEW

PERFORMANCE RATING GUIDE

Employee's Name/Number

Job Title

Evaluation Date

Evaluator

1. Poor judgment, needs constant supervision
2. Must be checked closely, difficulty in application
3. Avoids responsibilities, cooperation fair
4. Adequate, understands policies
5. Satisfactory, needs occasional supervision
6. Usually accurate and dependable, constructive
7. Good judgment, good leader, thinks independently
8. Well informed, consistent, keen and original, plans well
9. Willing to be held accountable, maintains consistent controls
10. Self starter, recognized authority, excellent, dynamic, outstanding

(✓) (✓)

AREA OF REVIEW		Evalu- ation Rating (1-10)	Not Observed	Comments Attached
<u>A. PROCEDURE COMPLIANCE</u>				
x.	Adherence to	x _____		
y.	Attitude toward	y _____		
<u>B. SAFETY</u>				
x.	Utilization of	x _____		
y.	Attitude toward	y _____		
<u>C. SECURITY</u>				
x.	Compliance with	X _____		
y.	Attitude toward	y _____		
<u>D. RADIOLOGICAL CONTROLS</u>				
x.	Application of	x _____		
y.	Attitude toward	y _____		
<u>E. TRAINING</u>				
x.	Comprehension of	x _____		
y.	Attitude toward	y _____		

EVALUATION OF JOB PERFORMANCE
SECTION B - PERFORMANCE REVIEW

ATTACHMENT "B"
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PERFORMANCE RATING GUIDE

Employee's Name/Number

Job Title

Evaluation Date

Evaluator

1. Poor judgment, needs constant supervision
2. Must be checked closely, difficulty in application
3. Avoids responsibilities, cooperation fair
4. Adequate, understands most policies
5. Satisfactory, needs occasional supervision
6. Usually accurate and dependable, constructive
7. Good judgment, good leader, thinks independently
8. Well informed, consistent, keen and original, plans well
9. Willing to be held accountable, maintains consistent controls
10. Self starter, recognized authority, excellent, dynamic, outstanding

✓) ✓)

AREA OF REVIEW	Evaluation Rating (1-10)	Not Observed	Comments Attached
F. <u>HOUSECLEANING</u>			
x. Exercise of	x _____		
y. Attitude toward	y _____		
G. <u>WATCH STANDING</u>			
x. Alertness	x _____		
y. Attitude toward	y _____		
H. <u>LOG TAKING</u>			
x. Adeptness	x _____		
y. Attitude toward	y _____		
I. <u>ADAPTABILITY</u>			
x. Accepts and promotes change	x _____		
y. Attitude toward change	y _____		
J. <u>LEADERSHIP</u>			
x. Ability to lead	x _____		
y. Attitude toward	y _____		

EVALUATION OF JOB PERFORMANCE
SECTION B - PERFORMANCE REVIEW

PERFORMANCE RATING GUIDE

Employee's Name/Number

Job Title

Evaluation Date

Evaluator

1. Poor judgment, needs constant supervision
2. Must be checked closely, difficulty in applicatio
3. Avoids responsibilities, cooperation fair
4. Adequate, understands most policies
5. Satisfactory, needs occasional supervision
6. Usually accurate and dependable, constructive
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8. Well informed, consistent, keen and original, plans well
9. Willing to be held accountable, maintains consistent controls
10. Self starter, recognized authority, excellent dynamic, outstanding

(S) (S)

AREA OF REVIEW	Evaluation Rating (1-10)	Not Observed	Comments Attached
K. <u>COGNITION</u>			
x. Job Knowledge	x _____		
y. Job Initiative	y _____		
L. <u>DECISION MAKING</u>			
x. Judgment	x _____		
y. Acceptance of Responsibility	y _____		

Only qualified individuals shall be assigned to perform safety-related operations duties. Qualification to perform safety-related operations may be obtained and documented by successful completion of the appropriate training as set forth in the BVPS-TM or by on-the-job training documented on the attached Employee Qualification Statement.

The content of "on-the-job" training for performance of an operations task involving safety-related equipment shall be determined by a qualified Operations Supervisor. A training plan will be prepared to provide guidance to the Trainer. The Trainer shall be a person qualified to perform the task and shall instruct the individual in the proper performance of the task. The Trainer shall complete the Employee Qualification Statement form and shall attach the Training Plan and other specific items not covered on the form. The Trainer shall determine through questioning and/or demonstration that the Trainee understands the training received and is qualified to perform the task for which instruction was given. By his signature on the Employee Qualification Statement form, the Trainer certifies that the training has been given as described on the form and its attachments and that the Trainee has been examined and found to possess a satisfactory degree of knowledge to perform the task. The Employee Qualification Statement form and attachments shall be sent to the Director, Nuclear Training, for review and inclusion in the training records.

The Evaluation of Job Performance form, as described in SAP Chapter 15, shall be utilized to determine the long-term effectiveness of training.

NO.	RECORD TYPE	UNIT	RECORD TYPE	ALT. CD.	ALT. DATA	SOURCE	DESTINA.
194	C4, CC1, 002						

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Figure 0.2

ATTACHMENT "C"
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EMPLOYEE QUALIFICATION STATEMENT

 Employee Name/Number Course Title (1) Completion Date

 Employee Job Title Ralph Code

Description of Instruction: (1)

Description of Tasks: (1)

Reason/Requirement for Instruction:

This qualification is conditional and limited by the following waivers or physical limitations. (If no restrictions, state "None").

Employee qualified to perform specific tasks noted above. Supportive documentation attached.

- cc: Manager Nuclear Operations
- Manager Nuclear Support Services
- Individual Staff Supervisor
- Employee's File

 Signature of NSS, NSOF, or
 Person Responsible for Trng.

Reviewed by: _____
 Supervisor of Training

(1) If course or training is not described in TM-1, a description of instruction completed and assigned task must be provided.