

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-155/82-09(DETP)

Docket No. 50-155

License No. DPR-6

Licensee: Consumers Power Company
212 West Michigan Avenue
Jackson, MI 49201

Facility Name: Big Rock Point Nuclear Plant

Inspection At: Charlevoix, MI; Jackson, MI (7/7/82)

Inspection Conducted: June 21-25, July 7, 1982

Inspector: *M. M. Holzmer*
M. M. Holzmer

9/13/82

Accompanied By: *R. C. Janke*
R. C. Janke

9-13-82

Approved By: *W. D. Shafer*
W. D. Shafer, Chief
Management Programs Section

9/13/82

Inspection Summary

Inspection on June 21-25, July 7, 1982 (Report No. 50-155/82-09(DETP))

Areas Inspected: Routine, unannounced inspection of Big Rock Point non-licensed training, licensed operator requalification training, and quality assurance programs. The inspection involved 35 inspector hours onsite by one NRC inspector and 28 hours by one inspection assistant (co-op).

Results: Of the three areas inspected, one item of noncompliance was identified in one area (Quality Assurance Procedures not adequate to ensure timely corrective action) and a total of two noncompliances were identified in two areas (failure to follow procedures in both licensed operator requalification training and nonlicensed training, and inadequate procedures in nonlicensed training.)

DETAILS

1. Persons Contacted

At Big Rock Point:

- *D. Hoffman, Plant Superintendent
- *E. MacNamera, Training Supervisor
- *E. Raciborski, QA Superintendent
- A. Sevener, Operations Department Superintendent

At the corporate office, Jackson, MI:

- +P. Elbert, Director, Nuclear Operations Training Department
- +J. Corley, General Superintendent, QA Operations
- W. McConnell, QA Administrator

The inspector also interviewed several other licensee employees including reactor operators and senior operators, instructors, training staff personnel, clerks and QA personnel.

*Denotes those present at the exit interview on June 25, 1982.

+Denotes those present at the exit interview on July 7, 1982, at the corporate office.

2. Licensee Action on Previous Inspection Findings

(Closed) Open Item (50-155/81-05-01): Conflicting retraining requirements. The licensee's procedure AP 1.13 and their Master Training Plan contained conflicting requirements for Radiation Protection retraining. This single item is closed for tracking purposes and will be included under the general problem of conflicting training requirements described in paragraph 4 of this report (Noncompliance 50-155/82-09-03).

3. Requalification Training

The inspector verified that any changes made to the requalification program were in conformance with requirements and commitments, that the licensee has prepared lesson plans or other documentation which adequately described the scope and depth of the lectures, and that the licensee had evaluated the results of the most recent annual examinations to identify deficient areas to be covered in the lecture series. For three licensed reactor operators and three licensed senior reactor operators (shift supervisors) the inspector reviewed or verified the availability of the following: the most recent annual written examination and the individuals' response, documentation of attendance at required lectures, required control manipulations, performance evaluations, additional training received in identified deficient areas, and required procedure review.

a. Documentation Reviewed

- CPC-2A Quality Assurance Topical Report
- NOTD Procedure No. 3, Rev. 0, September 3, 1981
- Big Rock Point Plant Manual, Volume 18, "Master Training Plan", Chapter Four
- Personnel Training Records
- Lesson Plans

b. Findings

Noncompliance (50-155/82-09-01): Contrary to the procedural adherence requirements of ANSI N18.7-1976, lesson plans were not approved as required by NOTD Procedure No. 3.

NOTD Procedure No. 3, Rev. 0, dated September 3, 1981, paragraph 5.3.1 required all lesson plans to be approved by the Training Supervisor. Of the four lesson plans reviewed which were written and used since NOTD Procedure No. 3 became effective, none were approved by the Training Supervisor. Approval of lesson plans was not required prior to September 3, 1981, and conversations with the licensed operator requalification training instructor indicated that all of his lesson plans were being written and used without regard to the review and approval requirements of NOTD Procedure No. 3.

c. Discussion

Unresolved Item (50-155/82-09-02): Requalification lecture and examination practices.

Licensed personnel received requalification training for about ten weeks each year. Training for seven of these weeks normally consisted of two days of lectures by the training staff and two days of systems training conducted by shift supervisory personnel. No credit is taken for the systems training in the requalification program and is not coordinated through the Nuclear Operations Training Department. Most of the lectures concentrated on design changes, modifications and procedure revisions, instead of reviewing and continuing training in the subjects listed in 10 CFR 55, Appendix A. A small group of other lectures was included under the general description of Special Topics. These involved either generic or specific problems associated with the plant, such as reactor theory, or turbine operations.

The requalification program also included a week of lectures given for simulator preparation, a one week simulator course, and a week which consisted of four days of "examination review" followed by the annual requalification examination. Comparison of the lesson plan for "examination review" with the Reactor Operator (RO) and Senior Reactor Operator (SRO) 1981 requalification exams revealed that over one third of the available points for the RO exam and nearly one half of the available points for the SRO exam were covered in the four days prior to the exam. Few of the exam questions were covered during the year of training prior to the exam. Both section grades and overall grades for the 1981 requalification exam were passing for all persons taking the exam.

Although preplanned lectures in the subjects listed in 10 CFR 55, Appendix A are only required "...where annual... written examinations indicate that emphasis in scope and depth of coverage is needed...", the effectiveness of the lectures series is questionable when there is little continuing training in many of the subjects pertinent to licensed operations, when systems training is not coordinated with the requalification training staff, and when the results of the examinations are considered together with the type of "examination review" used at Big Rock Point. The scope of the requalification lecture series and the annual examination practices are considered to constitute a significant program weakness.

In accordance with the cover letter of this report, you have been requested to have qualified individuals, independent of the plant training organization, investigate these matters and to provide the time schedule for the completion of the evaluation.

4. Training

The inspector attended the licensee's one hour General Employee Training and verified that the training was in accordance with the objectives of ANSI/ANS 3.1 (12/79 Draft). The inspector verified by direct questioning and/or record review for two new and four existing employees that administrative controls and procedures, radiological health and safety, industrial safety, fire protection program, controlled access and security procedures, emergency plan, and quality assurance training were provided as required by the licensee's technical specifications and quality assurance program. The inspector also verified that on-the-job training, formal technical training commensurate with job classification, and fire fighting training were provided, and that female employees who have access to the controlled area are provided instructions concerning prenatal radiation exposure in accordance with Regulatory Guide 8.13.

a. Documentation Reviewed

- Big Rock Point Plant Manual, Volume 18, "Master Training Plan," Revision 44, June 1982
- NOTD 1.0 Introduction, Rev. 0, September 3, 1981
- NOTD 2.0 Organization and Responsibility, Rev. 0, September 3, 1981
- NOTD 3.0 Preparation of Procedures, Programs, Lesson Plans, Rev. 0, September 3, 1981
- NOTD 4.0 Definitions Rev. 0, November 12, 1981
- NOTD 6.0 NOTD Instructor Qualification and Certification Procedure, Rev. 0, February 4, 1982
- NOTD 12.0 Auxiliary Operator Training (Pre-Licensing) Rev. 1, October 30, 1981

Reactor Operator Licensing Training

Senior Reactor Operator Licensing Training

Auxiliary Operator Requalification Training

- Training Records

b. Findings

Noncompliance (50-155/82-09-01): Contrary to ANSI N18.7-1976, procedures which specified periodic retraining requirements were not followed.

Annual and biennial retraining requirements for continuing training and for General Employee Training (GET) topics were specified in the Big Rock Point Master Training Plan in both the various chapter texts and in Training Matrices.

Training Matrices were defined as "An arrangement of job positions vs. required subjects to be covered in a two-year period." Other retraining requirements were specified for various job positions in these matrices. The training records of about 18 persons were examined to verify that retraining was received as required. Approximately 25 examples of failure to complete required retraining were identified. These were in the areas of Emergency Plan training, Site Emergency Drills, Quality Assurance, radiation protection, crane and forklift training and hospital plan training, and occurred approximately over the past 3 years.

Noncompliance (50-155/82-09-03): Contrary to ANSI N18.7-1976, procedures with conflicting retraining requirements were contained in the Master Training Plan.

Retraining requirements for GET and other topics were found in three locations. The Master Training Plan had some requirements in the text and in a Training Matrix Plan appended to each department's chapter. In addition, Appendix F to the Master Training Plan contained a Matrix of training requirements for job positions in all plant departments. These requirements conflicted in that all matrixed topics were defined to be biennial and some of the same required topics found in the text were annual. An example is "Radiation Protection, Respiratory Protection" which is an annual requirement for maintenance personnel in section 5.2 of the Master Training Plan. Appendix A to Chapter 5 of the Master Training Plan, the Maintenance Department Training Matrix, lists "Rad Prot. Exempt" and Respiratory Protection, Tech Specs" as the required biennial Radiation Protection type topics. Appendix F of the Master Training Plan lists the same topic areas as "Rad Prot. 10 CFR 19, 10 CFR 20" and indicates this to be a biennial requirement for maintenance personnel.

A similar issue was previously identified as an open item in NRC Report No. 50-155/81-05. Section 2 of this report discusses the disposition of Open Item No. 81-05-01.

c. Discussion

Unresolved Item (50-155/82-09-04): Training summary sheets in training records needed revising.

Training summary sheets are filed in each training record. These sheets include GET topics, lectures and other job related training. The organization of these summary sheets was such that it was difficult to determine if required retraining was needed for the individual. These sheets could be a useful management tool if properly revised, and might assist in preventing failure to receive required training. (Reference Noncompliance 50-155/82-09-01). The Training Supervisor agreed to consider ways to increase the utility of the training records.

Unresolved Item (50-155/82-09-05): Lack of responsiveness to identified training weaknesses.

Since 1980, the Big Rock Point Training Department had been audited by INPO (5/81), Consumers Power Company Quality Assurance Department (9/81), and the NRC (Inspection Reports 80-03 and 81-05). Approximately twenty weaknesses, findings, unresolved items and open items were identified. Several of these items were either still open, or were closed, but

other related weaknesses existed in the same area. Examples of a slowness to respond to identified weaknesses included:

- Failure to adhere to the program requirements of the Master Training Plan, Volume 18. Identified in NRC Inspection Reports 80-03, 81-05, and cited in this report. (Reference Item No. 82-09-01)
- Several different weaknesses were identified in the Licensed Operator Requalification Program by INPO and by a CPCo Quality Assurance audit six months later. Major deficiencies were also noted in this report. (Reference Item No. 82-09-02)
- Needed clarification of annual and biannual retraining requirements was identified in NRC Inspection Reports 80-03 and 81-05, and in this report. (Reference Item No. 82-09-03)
- Four out of six findings of QA Audit Report No. A-QT-81-12 were still open nearly eight months after the report was issued.

It is noteworthy that many improvements have taken place. Many of the chapters of the Master Training Plan had been revised since the last inspection. In addition, the Big Rock Point training staff had increased from two personnel to six personnel and two contract instructors in the past year. The corporate training program is undergoing a complete revision which began in 1981. Some of the identified weaknesses noted in the various reports on Big Rock Point were being corrected as part of long range corporate plans to improve training rather than being corrected by a "quick fix" which may leave the root problems uncorrected. As a result, corrective action for some program weaknesses has taken longer. In spite of the progress made in the last year however, it is evident that major programmatic problems exist at Big Rock Point, which should have already been corrected. GET and retraining requirements need clarification, the Master Training Plan needs considerable revision after which its requirements must be implemented. Other identified weaknesses must be addressed.

It is recognized that major programmatic changes require considerable time, manpower and management attention. The inspector discussed these matters with the Plant Superintendent and the Director, NOTD. As requested in the report cover letter, please provide a written response to this unresolved item.

5. Quality Assurance (QA)

The inspector determined that the licensee recently upgraded its QA program by issuance of Topical Report CPC-2A; revision of the Big Rock Point Plant Manual to conform to new commitments was scheduled to be completed by November 1982; that this project is subdivided into tasks, the completion of which was on schedule; and that each of the revised procedures of the Plant Manual will be reviewed by QA personnel. In addition, the inspector followed up on the findings of an audit of Big Rock Point training.

a. Documentation Reviewed

- Topical Report, CPC-2A, Quality Assurance Program Description for Operational Nuclear Power Plants.
- QAPP 16-51, "Deviation Reporting and Corrective Action; Revision 4.
- QADP XVIII-2, "Conducting and Reporting Audits," Revision 6.
- Standard NODS-Q01, "Corrective Action and Control of Nonconforming Items," Revision 0.
- QA Audit report A-QT-81-12 and associated Deviation Reports (DR's).
- QADP XVI-1, Revision

b. Findings

Noncompliance (50-155/82-09-06): Procedures were not established which ensured timely corrective action of certain QA Audit Findings.

QADP XVIII-2 required that a Deviation Report (DR) or Non-conformance Report be originated for each QA Audit Report finding within 7 days of the post-audit conference. DR's were to be processed as required by QAPP 16-51 and any applicable lower-tier procedures. QAPP 16-51 required that an individual be assigned to conduct the "Evaluation and Disposition" and that an "Evaluation due date" and priority be assigned within 40 days of the date originated. For DR's sent to the plants or to the Quality Assurance Department for action, this evaluation due date was required by QADP XVI-1 to be no later than 30 days from the date of the audit for DR's originated as a result of QA audit findings. For the Nuclear Operations Training Department (NOTD), however, QADP XVI-1 was not applicable, and the less restrictive requirements of QAPP 16-51 applied. NOTD had no department procedure specifying requirements for DRs originated as a result of QA audit findings. As a result, there was no procedure which ensured timely corrective action for DR's written

as a result of QA audit findings for NOTD. Examples of QA audit findings for which timely corrective action was not taken were found in QA Audit A-QT-81-12 in which 4 of 6 findings had Evaluation due dates given which were nearly 8 months after the issue date of the Audit Report.

6. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. Unresolved items disclosed during the inspection are discussed in paragraphs 3 and 4.

7. Exit Interview

The inspectors met with licensee representatives denoted in Paragraph 1 at the conclusion of the inspection on June 25, 1982. The inspector summarized the purpose and the scope of the inspection and the findings.

Additional information was gathered during a visit to the corporate offices in Jackson, Michigan, on July 7, 1982, which impacted on the findings of the June 25 exit interview. The purpose, scope, and findings were discussed with the Director, NOTD and with the General Superintendent, QA Operations, listed in paragraph 1.