GPU Nuclear

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September 24, 1990

Mr. Thomas T. Martin, Administrator
U.S. Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406

Dear Mr. Martin:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Response to Training Inspection 90-80

Enclosed is GPU Nuclear's response to NRC letter dated August 20, 1990 which forwarded NRC Inspection Report 90-80 (NUREG 1220 Audit). As requested, this response identifies actions taken or planned to address the two areas of weakness discussed in the report. In addition, GPUN is providing clarification relative to the job and task analysis for the operator training programs which is also discussed in the report.

If there are any questions regarding this matter, please contact Mr. Michael Heller, Licensing Engineer at (609) 971-4680.

Very truly yours,

E.E. Fitzpatrick
Vice President & Director
Oyster Creek

EEF/MH:jc
(MH-LTR5 24)
cc: U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

NRC Resident Inspector
Oyster Creek Nuclear Generating Station

ATTACHMENT 1

Provided below are the actions taken or planned to address the two areas of weakness identified in NRC Inspection Report 90-80.

Area # 1 : Trainee Evaluation

In response to the grading discrepancies identified as a result of the special NRC team inspection (NUREG 1220 Audit), a critique was commenced on June 28, 1990 and completed on July 16, 1990. Additionally, LER 90-011 was submitted on July 23, 1990 to report the non-compliance related to this matter.

The critique identified personnel error (lack of attention to detail) and inadequate procedures (lack of a comprehensive procedure on the preparation, administration, and grading of exams) as the root causes of this event. Additionally, the requalification exam bank question format and quality (short answer/essay format along with ambiguous or non-specific wording stemming from a less than adequate validation) was cited as a major contributor.

In response to these findings, the following actions were completed:

a) By means of a written Training Department Instruction/Directive and a special departmental staff meeting, the Manager, Plant Training communicated management expectations relative to exam preparation, grading and administrative closeout to all training department personnel.

b) The Operator Training Manager and Supervisor of Operator Training also reinforced grading expectations to all operator training personnel in writing and in a special section meeting.

c) The critique report was required reading for all training department personnel.

Additionally, the following actions are underway:

a) A training session on the proper development of open reference test items for all operator training instructors is being presented (September 30, 1990).

b) A revalidation of the entire requalification written exam bank is on-going. Included in this effort will be the conversion of a major portion of the bank to an objective question format (March 31, 1991).

c) An operator training examination administration procedure is in the approval process. This procedure addresses the "process" aspects of the various steps of examination activity including preparation, administration and grading (October 30, 1990).

Area # 2 : Program Evaluation

GPUN agrees with the accuracy of the examples cited in Section 2.5 of Inspection Report 90-80 regarding concerns expressed by trainees about the training programs. GPUN also believes that existing evaluation mechanisms were in place to identify all but one of the examples. The exception would be the item related to inaccurate trainee evaluation and we believe corrective actions already identified previously in this attachment will satisfactorily address that issue.

Additionally, Oyster Creek will perform two integrated program evaluations in the operator training area. They will be performed in the third quarters of 1991 and 1992. These evaluations will include a combined assessment of test results, programmatic critiques, on-the-job feedback, internal and external program evaluations and training staff evaluations.

ATTACHMENT 2

The following clarification is provided relative to the job and task analyses for the operator training programs:

A) It is true that GPUN chose to enhance the analysis phase of our operator training programs by a revalidation effort. However, the revalidation will not result in a complete task analysis for all tasks in all programs. The revalidation effort consists of seven (7) parts:

1) Review all existing tasks for adequacy and usability. This may result in breaking a single task into several smaller tasks, accepting the original task and associated learning objectives as written, or significantly modifying an original task's wording to enhance clarity (modified task).

2) Review the current job's scope by reviewing procedures to identify any additional new tasks which should be listed as part of the job analysis.

3) Survey the entire task listing to rate all tasks based on frequency, importance, and difficulty.

4) Review the completed and surveyed job analysis task listing for selection of tasks for training and identification of which training program (initial, continuing or both) in which to present those tasks.

5) Do a full task analysis on any new or modified tasks identified in parts 1 or 2 above.

6) Identify the appropriate training setting (classroom, simulator, etc.) for each task selected.

7) Load pertinent data from the completed job/task analysis into the automated Training Matrix Management System (TMMS) for instructor utilization in lesson material development/upgrade. This will automatically result in a readily accessible task-to-training cross reference matrix.

Experience thus far indicates that this effort will result in approximately 70% of a program's tasks being fully analyzed. Due to heavy reliance on the control room operator task listing for requalification exam development, it remains our intent that this job classification will have an updated analysis on all tasks.

TMMS is being updated continuously. For example, all original tasks are entered into TMMS. As tasks are revalidated (steps 1, 2 and 3), TMMS is updated with the task list. As tasks are further analyzed (step 5), TMMS is again updated with this information. This process is designed to keep TMMS as current as possible for maximum use by instructors.

B) A fully current and easy to use task-to-training materials cross reference matrix will exist when the task revalidation/analysis effort is complete and fully loaded into TMMS. Until that time, when instructors are preparing for a lesson, they are required to refer to TMMS for task titles (and associated enabling objectives when available). By entering a system code number into TMMS, all associated tasks and/or enabling objectives can be instantaneously retrieved. The instructor then generates behavioral learning objectives from the task titles. If enabling objectives already exist, he/she uses them and the associated terminal objective to update the lesson plan. The lesson plans are then reviewed and approved by a user group manager.

The link between these training materials and the task list is now documented by recording the specific job/task analysis used on the cover page (Training Content Record) of the lesson plan.

This entire process is required by our Operator Training Lesson Plan Instruction which was presented to the inspection team. This instruction does not appear in the list of materials reviewed at the end of the inspection report.

We believe that this process is a good interim measure until all enhancements available through use of TMMS are fully usable. This process establishes a workable performance based training program based on the job analysis already in existence (and loaded into TMMS).

C) Although the number of new or modified tasks (541) in the CRO task revalidation seems large in comparison to the total number of original tasks (726), the original job analysis is not unacceptable. A large percentage of the 541 tasks are modifications to generic tasks that already existed to make the task listing specific to Oyster Creek. In the majority of cases, the original tasks were acceptable as written. This process is simply enhancing a fundamentally sound job analysis.