



WOLF CREEK

NUCLEAR OPERATING CORPORATION

John A. Bailey
Vice President
Nuclear Operations

November 18, 1990

NO 90-0288

Mr. R. D. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Subject: Docket No. 50-482: Request to Oversee Dynamic Simulator
Re-examinations

Dear Mr. Martin:

The purpose of this letter is to document Wolf Creek Nuclear Operating Corporation's (WCNOC) request to have NRC Region IV oversee the re-examination of five licensed operators who failed to successfully complete the dynamic simulator portion of the NRC evaluated licensed operator requalification examination. The requalification examination was administered at Wolf Creek Generating Station (WOGS) October 22 through November 2, 1990. On November 16, 1990, the request to have NRC oversee the re-examinations was discussed in a teleconference between NRC Region IV, NRR and WCNOC personnel. Successful completion of the re-examinations would be the basis for allowing these individuals to resume watchstanding activities, when necessary (e.g. illnesses or vacations) to supplement the currently established crews.

As a result of the October licensed operator requalification examinations, WCNOC has reconstituted the WOGS operating shift rotation from a six crew rotation to a five crew rotation. The five crew rotation will remain in place for the time being. Although the above individuals will not be utilized to increase the number of operating crews, they represent an essential resource that could be used to supplement the five crew rotation. WCNOC will not utilize more than one of these individuals on any operating crew unless unusual circumstances exist or NRC concurrence has been obtained.

WCNOC has thoroughly reviewed each of these individual's performance during the original requalification examination, established the basis for his failure and the specific remediation needed for each individual. The specified remediation has been accomplished along with extensive review and evaluation of each individual's performance on the simulator during several scenarios. It has been determined by WCNOC evaluators that these individuals are fully prepared for re-examination. Details of each individual's performance and remediation have been provided to your staff.

WCNOC is in the process of formalizing the root cause determination and the associated corrective actions needed to restore the licensed operator requalification training program to the required level of performance. WCNOC will discuss the complete results of this effort in a management meeting with the NRC on December 6, 1990. However, two apparent causes of the programmatic problems have currently been identified.

First, there was a failure to ensure that adequate human resources were available and appropriately applied to fully support the licensed operator requalification program. This limited the number of operator evaluations and examinations that could be performed prior to the formal examinations. Comprehensive practice examinations and evaluations would have aided in ensuring a high level of operator performance under the stress of an actual NRC examination. The licensed operator requalification training group currently consists of four positions. Since November 24, 1989 this group has experienced 150 percent turnover in qualified licensed operator requalification training instructors. This manpower loss combined with the heavy work load necessary to implement the guidance of the NRC Examiner's Standard, resulted in a shortage of qualified instructors for instruction and evaluation purposes.

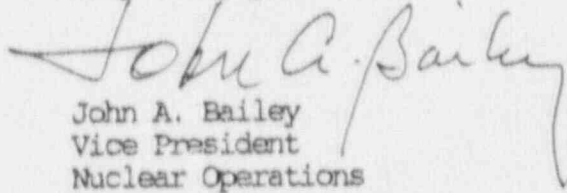
Secondly, the corrective actions WCNOC took based on the results of the 1989 licensed operator requalification examinations were not comprehensive enough to prevent additional program problems in 1990. The results of these examinations represented a precursor to the programmatic problems identified in the 1990 examination process.

As a result of these preliminary findings several immediate corrective actions have been instituted. All licensed operators will be remediated in the generic weaknesses identified as a result of the dynamic simulator examinations. This includes simulator sessions on Power Operated Relief Valve controls, steam dump operation, use of functional restoration procedures, and immediate boration requirements. The five individuals proposed for re-examination have successfully completed this remediation. Additional simulator sessions will be provided to each crew during the normal requalification training cycle. In addition intensive management attention has been focused on filling the vacant positions in the licensed operator requalification training group. Two of the three presently vacant positions will be filled in early December 1990.

Although the long term corrective action plan has not been finalized, it will tentatively include a re-evaluation of the staffing levels and organizational structure of the Training Department. Proposed long term enhancements to the requalification training program consist of additional practice examinations and evaluations observed and critiqued by peer reviewers. Additionally a professional stress management course is being considered to ameliorate the impact of examination stress on operator performance.

If you have any questions concerning this matter, please contact me or Mr. H. K. Chernoff of my staff.

Very truly yours,


John A. Bailey
Vice President
Nuclear Operations

JAB/jra

cc: A. T. Howell (NRC)
J. L. Pellet (NRC)
D. V. Pickett (NRC)
M. E. Skow (NRC)

ENCLOSURE 7

NRC CONCURRENCE TO RETURN OPERATORS TO LICENSED DUTY
Wolf Creek Generating Station

On November 18, 1990, NRC received a request from WCNOG for concurrence to reexamine five of the individuals who had failed the operating section of the requalification examination. The intent was to return the individuals to licensed duties as shift reliefs upon successful completion of the reexamination. Documentation of the remediation process for each individual was provided to NRC for review.

Based on review of the documentation of the remediation provided for each individual, review of the weaknesses exhibited by individuals during the NRC examination, and review of the proposed reexamination, NRC agreed to observe the reexamination on November 21, 1990.

The reexamination was observed at the Wolf Creek simulator by J. Pellet.

As a result, concurrence was granted to return four of the five individuals to licensed duty with the stipulation that these individuals were subject to reevaluation during a NRC-administered requalification examination prior to license renewal.

ENCLOSURE 8

MANAGEMENT MEETING SUMMARY

On December 6, 1990, a management meeting was in the Region IV office. The following persons were in attendance:

<u>NRC</u>	<u>Facility</u>
L. J. Callan	B. D. Withers
J. P. Jaudon	J. A. Bailey
T. P. Gwynn	J. Weeks
D. Pickett	J. A. Zell
L. Miller	D. Fehr
J. L. Pellet	K. Chernoff
A. Howell	J. M. Keeton
J. E. Whittemore	W. B. Jones

The licensee presented their root cause analysis and corrective action plan.

The root cause was identified as a lack of operator training resources, which impacted requalification training program effectiveness, and a lack of ongoing performance monitoring to measure training effectiveness.

To correct these deficiencies, the licensee is aggressively acting to staff vacant positions in the training department. Feedback mechanisms have been implemented to provide an ongoing assessment of requalification training effectiveness. These include interim dynamic simulator evaluations and regular meetings among licensed operators, operations management, and training management and staff.

NRC concluded that the identified root cause and proposed corrective actions appear to encompass the fundamental reasons for the unacceptable operator performance on the NRC administered requalification examination. The proposed actions appear to be adequate to correct the identified root cause.

WCNOC MANAGEMENT MEETING WITH
NRC REGION IV MANAGEMENT

LICENSED OPERATOR
REQUALIFICATION TRAINING



December 6, 1990

WOLF CREEK
NUCLEAR OPERATING CORPORATION

LICENSED OPERATOR REQUALIFICATION TRAINING

INTRODUCTION - JOHN BAILEY

SELF-ASSESSMENT
ROOT CAUSE DETERMINATION

MANAGEMENT ACTIONS - JIM ZELL

IMMEDIATE ACTIONS
FURTHER ACTIONS TO BE TAKEN

OPERATOR PERFORMANCE - JIM WEEKS

GUIDANCE
MONITORING

SUMMARY - JOHN BAILEY

CLOSING REMARKS - BART WITHERS

SELF-ASSESSMENT

- PERFORMANCE OF SELF-ASSESSMENT

INDIVIDUAL EXAMINATION RESULTS

OPERATOR PERCEPTIONS

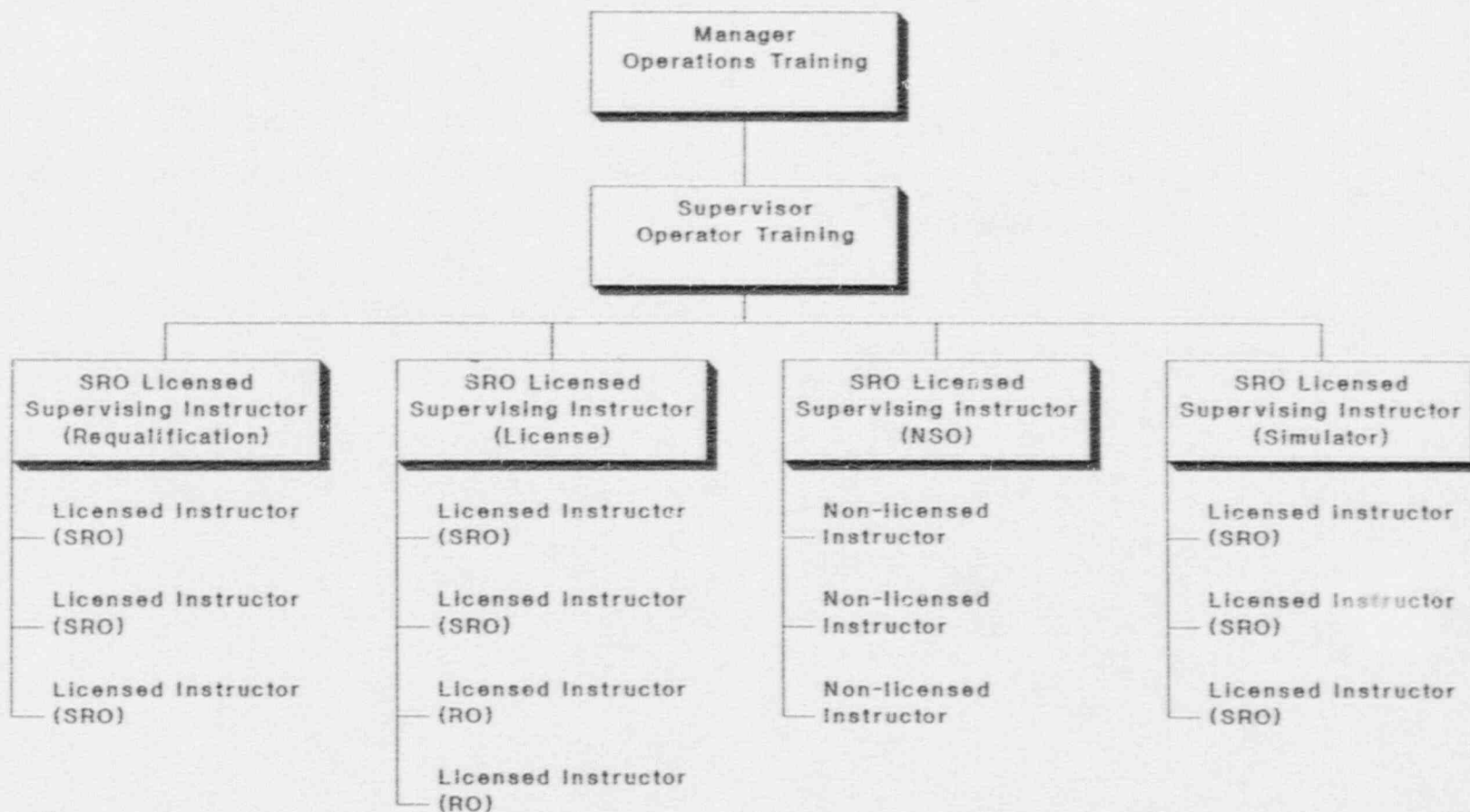
PROGRAM CONDUCT AND ADMINISTRATION

ROOT CAUSE DETERMINATION

- ROOT CAUSE DETERMINATION

ROOT CAUSE

Failure to ensure that adequate human resources were available and appropriately applied to fully support the licensed operator requalification training program



MANAGEMENT ACTIONS

- IMMEDIATE ACTIONS

AUGMENT TRAINING STAFFING

CREW RETRAINING

INCREASE SIMULATOR TRAINING TIME

- FURTHER ACTIONS TO BE TAKEN

WEEKLY EXAMINATIONS AND EVALUATIONS

PERFORMANCE MONITORING

MANAGEMENT ASSESSMENT

TRAINING STAFFING GUIDELINES

STRESS MANAGEMENT COURSE

INSTRUCTOR DEVELOPMENT

VERIFICATION OF CORRECTIVE ACTION

OPERATOR PERFORMANCE

- CONDUCT OF OPERATIONS

STANDARDIZATION

GUIDANCE DEVELOPMENT

LICENSED OPERATOR PERFORMANCE STANDARDS

COMMUNICATIONS

- COMMUNICATIONS TO MANIPULATE PLANT COMPONENTS SHALL BE SPECIFIC AS TO WHICH COMPONENT AND HOW IT IS TO BE MANIPULATED.

- WHEN MAKING A REPORT OR COMMAND, THE PERSON MAKING THE COMMUNICATION IS RESPONSIBLE FOR ENSURING THE INTENDED RECIPIENT HAS RECEIVED THE INFORMATION.

- COMMUNICATIONS TO MANIPULATE PLANT COMPONENTS SHALL BE ACKNOWLEDGED PRIOR TO PERFORMING THE MANIPULATION. (VERBATIM REPEAT-BACK IS RECOMMENDED BUT NOT MANDATORY)

LICENSED OPERATOR PERFORMANCE STANDARDS

PLANT STATUS AWARENESS

- EVERY CREW MEMBER SHOULD MAINTAIN CONSTANT AWARENESS OF THE ENTIRE PLANT STATUS.

- THE BOP SHOULD ALWAYS BE AWARE OF OF THE S/G LEVELS, FEED FLOW, STEAM FLOW, STEAM PRESSURE AND THE TRENDS OF THESE PARAMETERS.

- THE RO SHOULD ALWAYS BE AWARE OF THE RCS LEVEL, PRESSURE, TEMPERATURE AND THE TRENDS OF THESE PARAMETERS.

OPERATOR PERFORMANCE

- PERFORMANCE MONITORING

MEASURING PERFORMANCE

EVALUATION PROCESS

WEEKLY EXAMINATIONS

WEEKLY CRITIQUES

SUMMARY