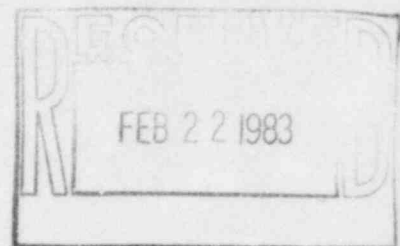


# Nebraska Public Power District

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LQA8300005

February 17, 1983



Mr. G. L. Madsen, Chief  
Reactor Projects Branch I  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive  
Suite 1000  
Arlington, Texas 76011

Subject: NPPD Response to IE Inspection Report No. 50-298/82-36

Dear Mr. Madsen:

This letter is written in response to your letter dated January 18, 1983, transmitting Inspection Report No. 50-298/82-36. You indicated certain of our activities were in violation of, or deviated from, NRC requirements.

Following is a statement of that violation and deviation and our response in accordance with 10CFR2.201.

### Statement of Violation

#### Failure to Follow Requirements of Approved Requalification Training Plan

10 CFR Part 50.54(i-1), states in part, "Notwithstanding the provisions of 50.59, the licensee shall not, except as specifically authorized by the Commission, make a change in an approved operator requalification program by which the scope, time allotted for the program or frequency in conducting different parts of the program is decreased." The licensee's approved requalification training program requires that individuals who score less than 80% correct on a section of the annual requalification examination, attend lectures pertinent to that section and that written examinations covering the lecture material presented be given.

Contrary to the above, two individuals who had scored less than 80% on specific sections of the 1981 requalification examination failed to attend lectures pertinent to those sections, and one individual was not given a written examination after lectures which he was required to attend because of low scores on the annual requalification examination.

#### Discussion of the Violation

The individuals who did not attend the required training sessions and complete the examinations were in engineering and maintenance supervisory/administrative positions rather than operators. As the required training was scheduled to fit in with the operators' schedules, numerous conflicts arose until finally the tracking for this item unfortunately failed. While this does not excuse the error, it is important to note that an operator was not assigned on watch with a knowledge deficiency which could be considered detrimental to the continued satisfactory operation of the plant.

#### Corrective Steps Which Have Been Taken and the Results Achieved

Both individuals who did not attend required lectures have completed training pertinent to the material where the annual requalification examination indicated a need for additional training. An examination covering these subjects is scheduled to be given by March 18, 1983. The individual who did not take a required examination is no longer employed at Cooper Nuclear Station.

#### Corrective Steps Which Will Be Taken To Avoid Further Violations

Requalification training scheduled as a result of low scores on the annual requalification examination will be monitored more closely to assure that personnel required to attend in fact do complete the required training and take the appropriate examinations over that training. The Station Superintendent will be kept informed of any failure to meet this requirement.

#### The Date When Full Compliance Will Be Achieved

Cooper Nuclear Station will be in full compliance by April 1, 1983.

#### Statement of Deviation

##### Failure to Conduct Training as Committed

The Nebraska Public Power District's letter, serial LQ8200023, dated June 1, 1982, stated in paragraph 2 of the enclosure:

"The elements of the CNS Training Program for licensed operators which are pertinent to BWR accident mitigation involving a degraded core address all of the areas identified in enclosure 3 to Denton's March 28, 1980, letter. Many of the areas are addressed in the abnormal and emergency procedures which all licensed operators are required to review annually. Formal classroom requalification training in accident mitigation involving a degraded core will include all pertinent areas in enclosure 3 of Denton's March 28, 1980, letter."

In deviation from the above, the requalification examination given to reactor operators and approximately one-half of the senior reactor operators did not address mitigation of core damage. Review of completed and scheduled requalification training for 1982 did not indicate any formal classroom training on mitigation of core damage.

### Discussion of the Deviation

The commitment concerning BWR accident mitigation was made in June of 1982 after the May 1982 requalification examination was given. Thus in a legal sense, no deviation existed as the commitment was made subsequent to the requalification examination. In the spirit of conducting meaningful training on pertinent subjects, it should be noted the examination given to one-half the senior reactor operators did cover mitigation of core damage which demonstrated the intent of the training effort to include pertinent elements of mitigation of core damage in routine training. As the June 1982 commitment (referred to in the statement of deviation) was formulated, it was the intent of the Training Coordinator to emphasize and develop pertinent aspects of the mitigation of core damage within the framework of regularly scheduled topics which included abnormal and emergency procedures. Additionally, the commitment intended for spot coverage of the mitigation of core damage to appear on examinations enough such that operators would be specifically responsible and held accountable for knowledge of these topics. However, it was not intended for mitigation of core damage to be preponderant in examinations. Rather the major thrust of the operator training was conceived to be avoidance of any core damage. Bearing in mind the supervisory recall system presently in effect, it was assumed that the STA, engineering staff, and plant management would bear the brunt of the responsibility in directing plant operations in the event mitigation of core damage became necessary.

It should be noted that 1980 requalification program submittal contains a list of topics which would include discussion of mitigation of core damage. These topics are marked by an asterisk. This method fully supports and is in agreement with the Training Coordinator's intended method of instruction. In Mr. Vassallo's letter of December 9, 1982, which includes a Safety Evaluation (SE) and Technical Evaluation Report (TER), it states in part that "the upgrade in Reactor Operator and Senior Reactor Operator Training and the Training for the Mitigation of Core Damage are acceptable". Thus it seems the apparent deviation is a result of the inspector's interpretation of what constitutes the approved program and what the Cooper Nuclear Station submitted.

Additionally, in the burdensome process of proposing a commitment, reviewing a commitment, receiving acceptance of a proposed commitment, and implementing a commitment the Training Coordinator was not sure of which items constituted proposals and which items constituted commitments which were reviewed and approved by the NRC. This seems to be substantiated by certain of the proposed 1980 requalification items not yet having NRC approval nor disapproval.

Apparently the training and requalification programs approved by the NRC consists of the 1976 submittal and the 1982 submittal. Since the NRC has remained silent on the 1980 submittal, interpreting the meaning of the approved 1982 amplifying information is difficult. Only the 1976 submittal can be effectively dealt with in any discussion of whether a deviation or violation has occurred.

Concerning various items of discussion in the letter transmitting the violation and deviation, it was noted by the inspector that the one "part-time" instructor in the training department in addition to the training coordinator was used "frequently" as a replacement watchstander. It should be made clear this individual was assigned only 16½ days of shift work in 1982. Five shift days were used in August to provide vacation coverage. Eleven shift days were used in July to allow the additional simulator training commitment to be completed. During these two periods of time, it seemed most valuable to utilize this individual to permit the simulator training and vacation period to be completed in the shortest period of time thereby maximizing personnel attendance when training sessions were scheduled.

The NRC inspector noted the 1982 license requalification examinations used only five subject areas and that the use of only five subject areas was a discrepancy. It is the District's understanding from a training meeting conducted at Bethesda, Maryland, January 6, 1982, that the use of five subject areas is consistent with NRC guidance. The apparent conflict in the NRC guidance for the examinations and the inspector's understanding of the requirements should be clarified.

The October 1980 training submittal indicated the shift supervisor or simulator instructor would provide evaluations of operator control manipulations. The NRC did not respond to this commitment in a negative manner thus Cooper Nuclear Station presumes these evaluative methods are acceptable. Since the inspector indicated these methods are not satisfactory, clarification of this item would be beneficial. The NRC response to the evaluation methods could be included in the NRC's overall response to the 1980 training submittal which it is presumed will be forthcoming at some future date.

It should be recognized that Cooper Nuclear Station has been fortunate in having employees who are able to complete vast amounts of on-the-job training. While difficult to quantify and document, the results of this training and the concern by the operators for good plant operations is evidenced by an all time record electrical energy production year for 1982, by a paucity of nonconformance reports relating to operating errors, and no trips or shutdowns due to licensed station operator or station operator errors. Currently Cooper Nuclear Station is expanding to six crews to permit additional effort to be expended in training and other areas of need.

#### Corrective Steps Which Have Been Taken And The Results Achieved

Personnel responsible for the preparation of the requalification program annual examinations were made aware of the requirement to cover all required subject areas in each examination. The Engineering Department has scheduled training for department personnel in mitigating core damage to be completed prior to the 1983 refueling outage which is scheduled to start on May 1.

#### Corrective Steps Which Will Be Taken To Avoid Further Deviations

The Training Coordinator will prepare a lesson plan or have one prepared on mitigating core damage for the Cooper Nuclear Station and coordinate with the Operations Trainer to assure that this training is incorporated into the cycle schedules. Engineering Department personnel training will also be scheduled annually on this subject. Where feasible, joint engineering and operations department training may be conducted.

Mr. G. L. Madsen  
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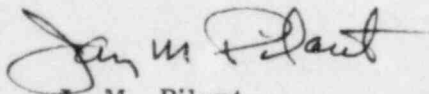
The Date When Full Compliance Will Be Achieved

Cooper Nuclear Station will be in full compliance by June 1, 1983.

As was indicated in the management meeting in Omaha on January 5, 1983, we have made a commitment toward improving our training programs and effort. We indicated that the above normal attrition of experienced senior licensed operators had caused certain parts of our training and requalification program to be slighted. We believe a recent approval of an incentive salary program for licensed operators filling certain required positions may slow this attrition and get us back on our planned program.

Although we have taken issue with certain items in the inspection report, we have done so to clarify our understanding of the issues involved and hopefully communicate to the region some constructive comments. If you have any questions regarding this response, please contact me.

Sincerely,



J. M. Pilant  
Division Manager of Licensing  
and Quality Assurance

JMP:KRW:cg/kz17/8

cc: D. E. Schaufelberger  
C. R. Jones  
R. S. Kamber  
R. E. Buntain  
J. D. Weaver