

DETAILS

1. Persons Contacted

R. Arsenault, Operations Department Head
S. Brawn, Fire Protection Coordinator
*J. Brinkler, Assistant Plant Manager
P. Cereste, Instructor
*R. Chase, Quality Assurance (QA) Supervisor
F. Gleason, Maintenance Section Head
L. Grimard, Operator Training Section Head
*A. Jordan, Quality Control Supervisor
J. Kirsch, Senior Instructor
R. Lawton, Director, Operations QA
D. Lemieux, Instrumentation and Controls (I&C) Supervisor
A. Proctor, Stores Supervisor
R. Radasch, I&C Section Head
*A. Shean, Director, Training
*J. Stevens, Specialty Training Section Head
*D. Sturniolo, Assistant to Plant Manager
K. Vachon, Maintenance Supervisor - Electrical
E. Wood, Plant Manager

*Present at exit interview.

2. Licensee Action on Previous Inspection Findings

(Open) Unresolved Item (309/82-06-02). Administrative control of the calibrations of instruments and gauges used to satisfy Technical Specification requirements. Procedure 3-6.2.1.3.1 which administratively controlled the above calibrations provided program format but did not specifically identify the instruments or gauges, the calibration frequencies, the ranges, or setpoints. A licensee representative stated that the specific information about these calibrations will be administratively controlled as part of procedure 6-03-4, I&C Department Preventive Maintenance. Further, he stated that the review of the calibrations and the incorporation of the specific instruments and gauges in the preventive maintenance procedure is approaching completion. The inspector reviewed the work completed and had no questions. This item remains open pending the complete incorporation of Technical Specification related calibrations into procedure 6-03-4 and subsequent NRC:RI review.

3. General Employee Training

a. Requirements

The requirements governing the training of personnel at nuclear power plants are specified in the following documents:

- 10 CFR 50, Appendix B, Quality Assurance Criteria
- Technical Specifications, Section 6
- Regulatory Guide 1.8, Rev. 1/ANSI N18.1-1971; Personnel Selection and Training
- Regulatory Guide 8.13; Instructions Concerning Prenatal Radiation Exposure

The above documents require that plant personnel be indoctrinated and periodically retrained in the areas of radiological health and safety, emergency plan, security and access control, industrial safety, quality assurance, and prenatal radiation exposure.

b. Program Review

The inspector reviewed procedure O-00-6, General Plant Training Program, to verify the licensee's program for indoctrination and retraining of plant personnel.

c. Implementation

The inspector reviewed the following areas to verify implementation of the general employee training:

- 1982 General Plant Training Meeting Schedule
- Records of attendance and makeup for general plant training sessions
- Records of indoctrination training for ten people
- Interviews with eight employees, including two temporary employees and one female employee

d. Findings

1. The inspector identified no violations.
2. The yearly retraining program is conducted by means of nineteen scheduled sessions during which as many employees as possible assemble in an auditorium for a presentation. The format is not practical for employees on shift work with assigned shift responsibilities. The inspector noted that attendance for the fourteen 1982 sessions has been averaging less than ten percent for operations personnel and less than forty percent for chemistry and health physics personnel.

Procedure O-00-6, General Plant Training Program, requires that those employees who miss the training sessions must review the

presentation notes and document their review. None of the 1982 sessions missed by operations, chemistry and health physics personnel had been reviewed and documented. The inspector reviewed 1981 retraining records and found that the reviews of missed presentations had been completed.

The inspector questioned the effectiveness of general plant training for personnel on a shift schedule with assigned duties based on the infrequent session attendance and the apparent review of material at year end.

A licensee representative stated that the training department was evaluating restructuring of this training to incorporate it into the technical training programs being implemented for shift personnel. The general training would then be achieved during specific training periods when shift personnel did not have assigned duties other than training. The representative stated the establishment of a restructured program for retraining of shift personnel is planned for early 1983.

The effectiveness of general plant retraining programs for shift personnel is unresolved pending establishment of a restructured program that is practical for shift personnel and subsequent NRC:RI review (309/82-15-01).

4. Non-licensed Technical Training

a. Requirements

The requirements governing the technical training of non-licensed personnel are specified in the documents referenced in paragraph 3.a.

b. Program Review

The inspector reviewed the licensee technical training program for non-licensed personnel in the areas of operations, instrumentation and control, and maintenance. Within those areas, the inspector reviewed the following procedures to verify that the training program meets the applicable requirements:

- 1-200-1, Initial Auxiliary Operator Training, Rev. 2
- 1-200-2, Non-Licensed Operator Retraining, Rev. 2
- 5-208-6, Initial and Continuing Training and Qualification of Maintenance Dept. Personnel, Rev. 2
- 6-303-1, I&C Department Training, Rev. 3

c. Implementation

The inspector reviewed the implementation of the technical training program to verify that the training was being conducted in accordance with the approved plant procedures and regulatory requirements. Specifically, the review was performed to determine if the training achieved the following:

- Training was meaningful to those individuals attending.
- The areas presented were covered accurately and sufficiently.
- Records were maintained which accurately reflected on-the-job and classroom training.

The inspector reviewed the following areas to verify technical training implementation:

- Interviews with six supervisory personnel
- Interviews with seven craftsmen and technicians
- Observations of two classroom training sessions
- Training department records for classroom sessions
- Departmental on-the-job training records

A licensee representative stated that the non-licensed technical training program has been greatly restructured with the last year such that technical training is now the responsibility of a separate Training Department composed of personnel experienced in their instructional areas. Previously, technical training was performed by personnel within the plant departments as a collateral duty. The representative stated that this increased commitment to technical training has improved the knowledge and capability of plant personnel. The inspector noted that interviews with craftsmen and technicians had confirmed that plant personnel had perceived the technical training improvement.

d. Findings

1. The inspector identified no violations.
2. Procedure 6-303-1, I&C Department Training, was last revised on May 13, 1981. Accordingly, the restructuring and upgrading of technical training has not been reflected in the procedure. Also, portions of the existing procedure are outdated. A licensee representative stated that a draft revision of the

procedure is currently being reviewed, and issuance of the revision is planned within a month. This item (309/82-15-02) is open pending issuance of a revised procedure 6-303-1 and subsequent NRC:RI review.

3. Interviews with recently trained auxiliary operators, who are part of the fire brigade during their work shifts, revealed that the operators were uncertain of the impact of radiological controls and requirements on fire fighting. The operators had thorough training in fire fighting, both classroom and practical aspects, and had adequate radiological health and safety training. However, the operators were uncertain of which radiological procedures would apply while fighting a fire in a radiation area.

The Fire Protection Coordinator stated that the licensee fire protection program is adequate in this area because one health physics person per shift, qualified in fire protection, is assigned to the fire brigade and is responsible for the health physics aspects of any fire. Further one fire drill per year is performed in a radiation area.

The Fire Protection Coordinator stated that the initial training of fire brigade members would be revised to ensure that they understood the impact of radiological controls on fire fighting.

This item (309/82-15-03) is open pending licensee action to ensure fire fighting in radiologically controlled areas is covered during initial fire brigade training and subsequent NRC:RI review.

5. Procurement

a. Requirements

The requirements governing the receipt inspection, storage, and handling of procured safety-related material and equipment are specified in the following documents:

- 10 CFR 50, Appendix B, Quality Assurance Criteria
- Regulatory Guide 1.33, Rev. 2/ANSI N18.7 - 1976; Quality Assurance Program Requirements
- Regulatory Guide 1.38, Rev. 2/ANSI N45.2.2; Packaging, Shipping, Receiving, Storage, and Handling Requirements

The above documents require that the processing of safety-related material and equipment achieve the following:

- Material and equipment received are receipt inspected by qualified personnel.
- Appropriate storage and packaging requirements have been specified and are being met.
- Identification is adequate and any non-conforming material is controlled.
- Items with limited shelf life are identified and controlled.

b. Program Review

The inspector reviewed the following procedures to verify that the licensee maintains an administrative system to meet the above requirements:

- 0-02-1, Material, Equipment, and Services Purchase
- 0-02-2, Maine Yankee Purchase Specifications
- 0-03-1, Material Receipt, Handling, and Storage
- 0-04-1, Material Identification and Control
- 0-08-1, Nonconformance Material; Parts, Components, and Service
- 0-08-4, Discrepancy Reports

c. Implementation

The inspector reviewed the following areas to verify proper program implementation:

- Toured warehouses 1 and 2
- Reviewed Shelf Life Log
- Hold Tag Log (April 9 - August 12)
- Three purchase order files with Receipt Inspection Reports
- Material and Equipment Storage Inspection (Semi-annual), April 2, 1982
- Receipt inspector's certification records

d. Findings

1. The inspector identified no violations
2. The inspector reviewed the licensee's implemented program for control of items with limited shelf life, including tags on all safety related items which identified the expiration date, the Shelf Life Log for control of purchased items, and Discrepancy Reports for missing purchase information concerning shelf life. However, the inspector found no procedures in the Quality Assurance (QA) Manual (listed above) which addressed implementing shelf life control. The inspector stated that as part of the quality assurance program for control of purchased safety-related material and equipment, shelf life control must be incorporated into the applicable procedures.

This item (309/82-15-04) is unresolved pending incorporation of the implemented shelf life control program into the applicable QA Manual procedures and subsequent NRC:RI review.

6. Quality Assurance Program Reviewa. Requirements

The requirements governing quality assurance programs are specified in the following documents.

- 10 CFR 50, Appendix B, Quality Assurance Criteria
- Technical Specifications, Section 6
- Regulatory Guide 1.33, Rev. 2/ANSI N18.7 - 1976; Quality Assurance Program Requirements

b. Program Review

The Quality Assurance (QA) Department has been increased within the last year to include a director, two supervisors, and six inspectors/auditors. These licensee QA personnel will be supplemented by contractor personnel during outages. Two of the inspector/auditor positions remained unfilled at the time of the inspection.

The inspector verified that QA program procedures reviewed as part of the inspection were consistent with existing licensee commitments and the NRC approved Operational Quality Assurance Program. Further, the inspector interviewed the QA Department management to verify that they understood their responsibilities under the revised organizational structure.

c. Findings

The inspector identified no violations.

7. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable, deviations or violations. Two unresolved items were identified during this inspection and are detailed in paragraphs 3.d.2. and 5.d.2.

8. Management Meetings

Licensee management was informed of the scope and purpose of the inspection at an entrance interview conducted on August 9, 1982. The findings of the inspection were periodically discussed with licensee representatives during the course of the inspection. An exit interview was conducted on August 12, 1982, (see paragraph 1 for attendees) at which time the findings of the inspection were presented.