



**North
Atlantic**

North Atlantic Energy Service Corporation
P.O. Box 300
Seabrook, NH 03874
(603) 474-9521, Fax (603) 474-2987

The Northeast Utilities System

Ted C. Feigenbaum
Senior Vice President &
Chief Nuclear Officer

NYN-94074

July 6, 1994

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

References: (a) Facility Operating License NPF-86, Docket No. 50-443
(b) USNRC Letter dated June 6, 1994, "Notice of Violation (NRC Inspection Report No. 50-443/94-08)," J. F. Rogge to T. C. Feigenbaum

Subject: Reply to a Notice of Violation

Gentlemen:

In accordance with the requirements of the Notice of Violation contained in Reference (b), the North Atlantic Energy Service Corporation (North Atlantic) response to the cited violation is provided as Enclosure 1.

Should you have any questions concerning this response, please contact Mr. James M. Peschel, Regulatory Compliance Manager, at (603) 474-9521, extension 3772.

Very truly yours,

Ted C. Feigenbaum

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Attention: Document Control Desk

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

Mr. Albert W. De Agazio, Sr. Project Manager
Project Directorate I-4
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. Antone C. Cerne
NRC Senior Resident Inspector
P.O. Box 1149
Seabrook, NH 03874

North Atlantic
July 6, 1994

ENCLOSURE 1 TO NYN-94074

REPLY TO A NOTICE OF VIOLATION

In a letter dated June 6, 1994 [Reference (b)], the NRC transmitted to North Atlantic Energy Service Corporation (North Atlantic) a Notice of Violation identified by the resident staff during the inspection period of April 12 through May 23, 1994. In accordance with the instructions provided in the Notice of Violation, the North Atlantic response to this violation is provided below.

I. Violation

10 CFR 50, Appendix B, Criterion II requires that plant workers be provided with indoctrination and training for activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained. Furthermore, Seabrook Station Quality Assurance Manual, Section 2.2 specifies that support personnel shall meet the requirements of ANSI/ANS 3.1, which requires that maintenance workers receive instructions and demonstrate the performance capability for special complex systems and components. The training shall be based on a task analysis of the worker's assigned function.

Contrary to the above, on April 10, 1994, a maintenance worker demonstrated neither suitable proficiency, nor performance capability in the conduct of a safety-related activity. The worker improperly operated the containment personnel air-lock resulting in equipment damage and personnel injuries. There was no evidence that the maintenance worker had received adequate training for this job, which should have been based upon a comprehensive task analysis of all operational aspects of the assigned functions.

This is a Severity Level IV violation (Supplement I).

II. Reason for the Violation

North Atlantic does not contest this violation. The reason for why a maintenance worker demonstrated neither suitable proficiency, nor performance capability in defeating the interlocks and opening the containment personnel hatch consists of two components, training and work assignment. These causes are discussed below.

Training

The maintenance worker who performed this task was qualified under the Job Incumbent Review (JIR) process to perform maintenance on the containment hatches, hence no formal training was necessary at the time of the JIR. The JIR process is a mechanism by which experienced workers receive qualification for a task based on their education and previous work history. The JIR process is utilized when workers transfer departments, new employees are hired, new qualification programs are established, or when tasks are added to existing qualification programs. The JIR process that was in place when the maintenance worker received qualification utilized a Job Incumbent Review Committee consisting of a supervisor, training coordinator, and a department supervisor. This committee evaluated a worker's background and work history applicable to a task and compared it to the skills required to perform the task as delineated in the task qualification guide. The committee then determined whether the individual possessed the requisite knowledge and skills to perform the task, or whether the individual required training to obtain the requisite knowledge and skills. North Atlantic has not identified any deficiencies with the JIR process. In this particular case, the JIR process adequately evaluated that the worker was qualified to perform maintenance on the containment hatches, however, as described below, the scope of the qualification guide was not updated to reflect the new task of operating the air-lock and defeating the interlocks.

As stated above, North Atlantic has determined that a new task was not identified for operating the airlock and defeating the interlocks. Qualification guides are intended to delineate the knowledge, skills and other qualifications necessary for an individual to successfully complete a task. Maintenance related qualification guides are typically created and/or revised at the request of the Maintenance Group. In this particular case, the qualification guide pertained to basic maintenance of the hatch operating equipment. This task was subsequently proceduralized and its scope was expanded to include defeating the interlocks to open both hatches. However, this new procedure was not reviewed to determine if the original qualification guide also required revision. Hence, a new task was not added to the qualification guide and it was not reviewed for training impact.

North Atlantic has determined that the new job task was overlooked due to inconsistencies in the way maintenance related qualification guides were reviewed and revised, as necessary, to reflect new tasks or task scope modifications. Ideally, when procedures are revised, the individual who revises the procedure apprises the training coordinators of the changes, who in turn, evaluate the need to revise the qualification guides and determine if any workers require retraining. However, this methodology was inconsistently applied by the Maintenance Group.

Work Assignment

The work assignment process utilized for this specific activity was not in accordance with the existing North Atlantic program and this contributed to this event. Specifically, this task required a minimum of two workers, yet only one was assigned to perform it. Additionally, this was an infrequently performed task with the potential for serious consequences if performed incorrectly, but no experienced workers were assigned to the task. Furthermore, contrary to Maintenance Group expectations for infrequently performed tasks where workers may not be proficient, the supervisor was not on the job at the start of the task.

III. Corrective Actions That Have Been Taken

1. Immediately following this event, North Atlantic stopped refueling outage related work and discussed this event with managers and first line supervisors. This discussion re-emphasized the need to perform tasks correctly and in accordance with procedures. Station managers and supervisors subsequently discussed this event with subordinates.
2. North Atlantic has temporarily assigned the mechanical, electrical, and I&C maintenance training coordinators to report to one supervisor. This will ensure consistency in the way procedures, procedure changes, and tasks are reviewed and incorporated, as necessary, into the qualification guides. This will also add consistency to the communications between the individuals who develop the procedures and the training coordinators.
3. North Atlantic has counselled the supervisor and workers directly involved with this event and has implemented disciplinary actions as appropriate.
4. North Atlantic has revised selected management training courses to include a discussion of the supervisor's responsibility to carefully consider the individual abilities of personnel assigned to tasks where skill of the worker will play a significant role in the outcome of the task.

5. As noted in the original event evaluation, North Atlantic has transferred the responsibility of defeating the interlocks and opening the containment airlock hatches to the Operations Department. To facilitate this, a new Operations procedure and Job Performance Measure (JPM) have been written and selected members of the Operations Department have received training on this evolution.

IV. Corrective Actions That Will Be Taken

North Atlantic will implement the following corrective actions:

1. North Atlantic is in the process of reviewing all maintenance procedures and repetitive task sheets (RTSs) to verify that tasks that require training or qualification, have been identified and are adequately addressed in the qualification guides. This review will be completed by July 8, 1994. Notwithstanding this, during the review process, if critical tasks are identified for which qualification is determined to be inadequate, immediate remedial actions will be taken to ensure that workers can adequately perform the subject task.
2. The North Atlantic Maintenance Group will subsequently determine which, if any, workers require training or retraining to adequately address the scope of the tasks identified in action IV.1, above. This evaluation will be completed by July 15, 1994.
3. Qualification guides that need to be developed or revised will be completed by December 31, 1995, or sooner, as necessary to support the qualification of workers. In accordance with the existing program, North Atlantic will ensure that only qualified workers are assigned to perform tasks.
4. When the lesson plans for the management training courses described in action III.4 above have been updated, a summary memorandum of the enhancements will be distributed to appropriate managers and supervisors. This will ensure that these ideas and concepts are communicated to the management team in an expeditious manner. It is anticipated that this summary memorandum will be developed by August 31, 1994.

V. Date When Full Compliance Will Be Achieved

North Atlantic will achieve full compliance by July 15, 1994, when action IV.2 above, is completed. Completion of this action will ensure that only qualified workers will be assigned to perform tasks that require qualification.