



Dave Morey  
Vice President  
Farley Project

Southern Nuclear Operating Company  
*the southern electric system*

August 12, 1994

Docket Nos.: 50-348  
50-364

10 CFR 2.201

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Joseph M. Farley Nuclear Plant  
Reply to Notices of Violations (NOVs)  
NRC Inspection Report Nos. 50-348/94-03 and 50-364/94-03

Gentlemen:

As requested by your transmittal dated July 14, 1994, this letter responds to both notices of violation, VIO-348,364/94-03-01, "Failure to Conduct Licensed Operator Retraining Activities in accordance with Procedures", and VIO-348,364/94-03-02, "Failure to Accurately and Appropriately Proceduralize Activities Related to the Licensed Operator Retraining Program", which are cited in the above NRC inspection report.

1) The notice of violation, VIO-348,364/94-03-01, "Failure to Conduct Licensed Operator Retraining Activities in accordance with Procedures" therein states:

10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings", requires that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures.

Administrative Procedure FNP-0-AP-45, Farley Nuclear Plant Training Plan, Appendix B, Section G.2.d, requires that each licensed operator satisfactorily complete an annual active simulator examination which includes a team performance evaluation.

Contrary to the above, on April 23, 1993, the Farley training department improperly determined that a team of three NRC licensed operators satisfactorily completed an annual active simulator examination when their performance was below the pre-determined performance standard for satisfactory examination completion.

This is a Severity Level IV violation (Supplement 1D)

The Southern Nuclear Operating Company (SNC) response to this notice of violation is provided in Attachment 1.

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2) The notice of violation, VIO-348,364/94-03-02, "Failure to Accurately and Appropriately Proceduralize Activities Related to the Licensed Operator Retraining Program" therein states:

10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings", requires that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures.

Contrary to the above, as of the dates of the inspection, some training department activities affecting quality were not documented by procedures appropriate to the circumstances (example 1); some training department procedures prescribe activities affecting quality which are not conducted (examples 3 & 4), and training department procedures do not contain instructions for all quality-related training department activities related to implementation of the licensed operator retraining program (examples 2 & 5).

The examples are as follows:

- (1) FNP-0-AP-1, "Development, Review, and Approval of Plant Procedures", directs that a set of Training Center Procedures be developed to define the activities that are performed by the training department.

Contrary to the above, all activities related to the conduct of licensed operator simulator retraining are not documented in controlled procedures at the Training Center Procedure level.

- (2) Guidelines for ensuring compliance with 10 CFR 55.49, "Integrity of Examinations and Tests", as it applies to simulator examinations, are not prescribed by procedure.
- (3) FNP-0-AP-27, "Conduct of Operations - Training Group", step 7.4, directs that a record of reactivity manipulations performed as part of license requalification will be documented and transmitted to document control.

Contrary to the above, this activity is not conducted as part of the licensed operator retraining program.

- (4) FNP-0-AP-45, "Training Plan", Appendix B, "License Retraining Program", Section E.4, states that each licensed operator will complete control and reactivity manipulations listed in the Operations Curriculum Guide.

Contrary to the above, each operator in the licensed operator retraining program does not complete the control and reactivity manipulations as required by the Curriculum Guide and as listed in the lesson sections of OPS-564, "License Simulator Retraining."

- (5) Guidelines for ensuring that licensed operators perform the quality related training department activity of reviewing Training Advisory Notices in a timely manner are not prescribed by procedure.

This is a Severity Level V violation (Supplement I.E)

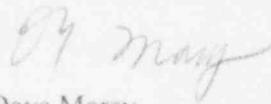
The SNC response to this notice of violation is provided in Attachment 2.

Confirmation

I affirm that the response is true and complete to the best of my knowledge, information and belief. If there are any questions, or if additional information is needed, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Dave Morey

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Attachments 1 and 2

cc: Mr. S. D. Ebnetter w/enc.  
Mr. B. L. Siegel w/enc.  
Mr. T. M. Ross

Attachment 1  
Response to Notice of Violation  
VIO-348,364/94-03-01

**“Failure to Conduct Licensed Operator Retraining Activities in Accordance with Procedures”**

**Admission or Denial**

The violation occurred as described in the subject report.

During one scenario of a simulator examination administered on April 23, 1993, to a crew consisting of three inactive staff SROs, the crew failed to perform a task identified as necessary to achieve a passing performance for the evaluation. The examination documentation stated that the crew did not perform this task because the STA failed to inform them of a change in steam generator feed and bleed criteria due to existence of adverse containment conditions. The STA was the simulator instructor, and he was aware of the change but did not point it out to the crew because he felt that he would have compromised the integrity of the evaluation by directing attention to the critical task. The crew failed to recognize that RCS feed and bleed criteria changed from 8% to 45% steam generator wide range level when adverse containment conditions developed; however, the crew was in the process of restoring feedwater to the steam generator to maintain an adequate heat sink. Subsequently, a meeting was held between the peer evaluators and training supervision to discuss and review the team's actions relative to the critical task. Since the team's actions met the intent of the critical task, the decision was made to pass the team. No procedural guidance existed to add, delete, or modify a critical task to the simulator exam. This resulted in inadequate documentation of the decision to pass the team.

**Reason for Violation**

Personnel error in that the acceptance criteria for the simulator examination was not followed completely or modified. A contributing factor was that no formal procedural guidance existed for utilizing an instructor as the crew's STA.

**Corrective Action Taken and Results Achieved**

As soon as a discrepancy in the exam was pointed out by the NRC, the training department initiated the necessary administrative process to ensure that the involved staff SROs were removed from the list of eligible watchstanders. A review of training records determined that one of the three individuals had subsequently passed an annual simulator operational exam. The remaining individuals have been removed from licensed duties until they complete 1994 simulator retraining or a determination is made to terminate the operator license.

**Corrective Steps to Avoid Further Violations**

This event has been determined to be singular in nature. This is based on a review of records for 1992, 1993 and 1994.

Evaluators involved in the evaluation of April 23, 1993, have been reinstructed that a team critical task failure fails the team unless a post exam review of the scenario and actions taken by the crew negates the task as critical and is so documented. FNP-0-TCP-17.3 will be changed to provide guidance on performance of post scenario critical task review for examinations where a team critical task has been missed. The practice of using an instructor, who is involved in the administration of the exam or has knowledge of the scenario, as a crew team member has been terminated. FNP-0-TCP-17.3, License Retraining Program Administration, will be

changed to specify that if a crew has insufficient SROs or does not have an STA, then an SRO licensed or STA certified individual with no knowledge of the exam will be provided to be the STA for that crew.

Date of Full Compliance

All items will be in compliance by September 2, 1994.

Attachment 2  
Response to Notice of Violation  
VIO-348,364/94-03-02

"Failure to Accurately and Appropriately Proceduralize Activities Related to the Licensed Operator Retraining Program"

Admission or Denial

The violation occurred as described in the subject report.

Reason for Violation

Personnel error in that certain Training Department activities were not properly documented or were properly documented, but had not received appropriate management approval.

Corrective Action Taken and Results Achieved

Procedure revisions are in process to correct all of the specific examples cited in the violation. In addition, a review has been conducted to ensure that training program requirements were being met and that there was no reduction in the quality of training, even though certain aspects of the training program may have not been formally documented or may have been approved by an inappropriate level of management.

Corrective Steps to Avoid Further Violations

The plant training and emergency preparedness manager will stress the importance of procedures and procedural adherence with the training center staff.

Date of Full Compliance

All items will be in compliance by October 7, 1994.