

APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-313/83-16
50-368/83-16

Dockets: 50-313
50-368

License: DPR-51
NPF-6

Licensee: Arkansas Power & Light Company
P. O. Box 551
Little Rock, Arkansas 72203

Facility Name: Arkansas Nuclear One (ANO), Units 1 and 2

Inspection At: ANO Site, Russellville, Arkansas

Inspection Conducted: July 11-15, 1983

Inspector: W.D. Johnson
J. P. Jaddon, Reactor Inspector, Reactor Project
Section C

7/29/83
Date

Approved: W.D. Johnson
W. D. Johnson, Chief, Reactor Project Section C

7/29/83
Date

Inspection Summary

Inspection Conducted July 11-15, 1983 (Report 50-313/83-16)

Areas Inspected: Routine, unannounced inspection of licensee action on previous inspection findings, the training program, and requalification training. The inspection involved 17 inspector-hours onsite by one NRC inspector.

Results: Within the three areas inspected, two violations were identified (failure to conduct general employee training for all required personnel and failure to follow procedures in requalification training, paragraphs 3 and 4, respectively).

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Inspection Conducted July 11-15, 1983 (Report 50-368/83-16)

Areas Inspected: Routine, unannounced inspection of licensee action on previous inspection findings, the training program, and requalification training. The inspection involved 17 inspector-hours onsite by one NRC inspector.

Results: Within the three areas inspected, three violations were identified (failure to maintain required requalification training records, failure to conduct general employee training for all required personnel and failure to follow procedure in requalification training, paragraphs 2, 3, and 4, respectively).

DETAILS1. Persons ContactedArkansas Power & Light Company

- *B. Baker, Operations Manager
- *B. Bata, Quality Assurance Engineer
- J. Constantin, Lead Trainer, Unit 2
- M. Durst, Training Supervisor, Technical Support
- *E. Ewing, Engineering and Technical Support Manager
- E. Force, Training Supervisor, Operations
- T. Green, Lead Trainer, General Employee Training
- *J. Levine, General Manager, ANO
- J. McWilliams, Operations Superintendent, Unit 1
- *L. Sanders, Maintenance Manager
- *J. Vandergrift, Training Superintendent
- E. Wentz, Lead Trainer, Unit 2

The NRC inspector also contacted other site personnel including administrative, clerical, document control, maintenance, operations and training.

*Denotes presence at exit interview conducted July 15, 1983. The NRC Senior Resident Inspector also attended this meeting.

2. Licensee Action on Previous Inspection Items

- a. (Closed) Violation (50-368/8204-01). This violation was the result of the licensee's failure to provide training on a design change to the fire detection system for at least some of the Unit 2 licensed operators. The NRC inspector reviewed records of the specific training conducted in response to this item. The NRC inspector reviewed records concerning this item, and how it was tracked as a Plant Safety Committee item and as a management item. The NRC inspector also interviewed licensee personnel who prepared briefing packages on design changes and related procedure changes. It was concluded that the licensee had taken the committed corrective actions; however, additional related information is in paragraph 4 of this report.

This item is closed.

- b. (Closed) Unresolved (50-313/8220-01 and 50-368/8217-01). This item was unresolved pending the completion of retraining and re-examination of the individual who had scored low on the annual requalification examination given in the Spring of 1982, and revision of licensee Procedure 1023.08. The NRC inspector found that the

individual concerned had been retrained and re-examined and that Procedure 1023.08 had been revised and reissued as Procedure 1063.08. A detailed discussion of the review of Procedure 1063.08 is included in paragraph 4 of this report.

This item is closed.

- c. (Closed) Violation (50-313/8228-01 and 50-368/8226-01). This violation was the result of the licensee's failure to keep requalification status logs up to date. Requalification status logs are required by the licensee's approved requalification plan and implementing Procedure 1063.08. The NRC inspector found that the licensee had appointed a specific individual with the responsibility to maintain these logs for both Units. It was noted at the time of this inspection that the requalification status logs reflected current requalification training status within the time frame committed to by the licensee. This time frame was one requalification training cycle or five weeks.

This item is closed.

- d. (Closed) Violation (50-313/8228-02 and 50-368/8226-02). This violation was the result of the failure of some licensed operators to complete the review of emergency procedures. The licensee's approved requalification training program requires a twice a year review of emergency procedures. The NRC inspector found that all emergency procedure reviews were current at the time of this inspection. It was noted, however, that many of the latest reviews had been completed beyond the scheduled "due date." The NRC inspector pointed out to licensee management that there had been a previous violation (NRC Inspection Reports 50-313/8106 and 50-368/8105) for this identical item. It was also pointed out that, although the licensee was in compliance at the time of this inspection, the fact that several emergency procedure reviews had been completed late during the most recent review period, casts doubt on whether or not the corrective action taken would preclude future recurrence of the violation.

This item is closed.

- e. (Closed) Open (50-313/8228-03 and 50-368/8226-03). This item was open pending a licensee review of the implementation of the requirement to review emergency procedures twice a year. The NRC inspector found that the licensee issued required review sheets to both licensed and senior reactor operators each calendar quarter. The review sheets listed one half of the emergency procedures. Thus, if licensed and senior reactor operators completed these review sheets in a timely manner, the twice a year review of emergency procedures would be spread evenly throughout the year.

This item is closed.

- f. (Closed) Unresolved (50-368/8226-04). This item was unresolved because the licensee had been unable to locate the scores of examinations given to Unit 2 operators as part of the requalification training program following emergency procedure classroom training in August and September 1981. 10 CFR Part 55, Appendix A, paragraph 5, requires, in part, "Records of the requalification program shall be maintained for a period of two years from the date of the recorded event to document the participation of each licensed operator and senior operator in the requalification program. The records shall contain copies of written examinations administered, the answers given" The NRC inspector was informed by licensee representatives, that the examinations in question could not be found. This is an apparent violation (50-368/8316-01).

The original unresolved item is closed.

3. Training

The purpose of this inspection was to determine whether or not training and retraining activities for non-licensed employees met the requirements of the Technical Specifications, Chapter 6.

The NRC inspector reviewed the following licensee procedures:

<u>Number</u>	<u>Subject</u>	<u>Revision</u>	<u>Date</u>
1063.01	Station Training	4	6/15/83
1063.05	On-The-Job Training Program	2	4/14/83
1063.07	General Employee Training Program	1	2/8/83
1063.10	Mechanical Maintenance Training Program	0	7/5/82
1063.11	Electrical Maintenance Training Program	0	7/29/82
1063.18	Professional/Technical Training Program	0	7/25/82
1063.22	Quality Control Training Program	0	7/5/82

The NRC inspector interviewed six craft personnel to determine what training they had received and what they considered to be strengths and weaknesses of the training received. From these interviews and record reviews, the NRC inspector concluded that the licensee's training program for maintenance personnel met the minimum requirements of ANSI 18.1-1971, which is a Technical Specification requirement. The NRC inspector noted that the licensee had made extensive use of vendor training and basic

skills training for junior maintenance personnel. A recurring opinion voiced during interviews was that many journeymen also needed basic skills training. This was an opinion that the NRC inspectors had heard during previous training inspections at ANO. Another concern heard during the interviews was that promotion for maintenance personnel to the journeyman level was based solely on time in grade and that there was no overall demonstration or test for journeyman level qualification. Licensee Procedures 1063.09, 1063.10, and 1063.11 appeared to reflect this in that they required a written examination and minimum grade (80%) after each skills area lesson but were silent to an overall demonstration of competence.

Within the area of General Employee Training (GET), the NRC inspector noted that Procedure 1063.07 defined ANO employees as, "Those individuals employed by Arkansas Power & Light Company normally assigned to ANO." Contractors and Vendors were defined as, "Those individuals employed by companies other than AP&L who are assigned to ANO." Additionally, Procedure 1063.07 defined AP&L employees as, "Those individuals employed by Arkansas Power & Light Company who are not normally assigned to ANO." The Technical Specifications for both Units 1 and 2 require that the retraining and replacement training program meet or exceed the requirements of ANSI 18.1-1971, Section 5.5. Use of the requirements and definitions within ANSI 18.1-1971 indicated that GET was to be given to, "all persons regularly employed in the nuclear power plant." Procedure 1063.07, however, restricted several elements of the GET program, specified in ANSI 18.1-1971, to "ANO Employees." Thus, by procedure, the licensee had failed to meet the minimum GET training requirements for several groups of individuals permanently assigned to the site, such as the contract guard force, architect-engineer staff, and the onsite quality assurance engineers and auditors. This is an apparent violation (50-313/8316-01 and 50-368/8316-02). In actual practice, it was determined that the situation was somewhat better than indicated by Procedure 1063.07, in that some groups were required to attend GET annual retraining, which nominally covered all elements of GET. Licensee representatives also expounded the position that the initial training on plant security and the emergency planning, in fact, covered all aspects of GET. The NRC inspector reviewed the script for this taped presentation and found that it did mention briefly each element of GET as delineated in ANSI 18.1-1971. The NRC inspector interviewed personnel who had been given this training during the period of the inspection. From these interviews, it was concluded that the training given did not include effective training on all the required areas; accordingly, the licensee's procedural position excluding many site personnel from required elements of GET represented an actual deficiency in his program and a violation of requirements.

The NRC inspector reviewed specific elements of the GET program. In general, lesson plans clearly expressed specific training objectives; however, in some cases the training objectives were not stated as such.

Also, test material appeared to measure retention of training objectives. In one case, quality assurance indoctrination, there were no training objectives stated in the lesson plan. The NRC inspector also noted that the lesson plan referenced the ANO Quality Assurance (QA) Manual, but in the actual presentation portion of the lesson plan, there was no mention of the QA Manual. During interviews, licensee training representatives stated that the lesson plan did not use the QA Manual because the training department did not have a copy of it. The NRC inspector checked the reference library in the training facility and found that they did not hold a copy of the QA Manual. In view of the fact that the QA Manual represents the licensee's committed method of implementing 10 CFR Part 50, Appendix B, the adequacy of training in this area is considered questionable and will be reviewed at a future inspection. This is an unresolved item (50-313/8316-02 and 50-368/8316-03).

It was noted that the licensee was in the process of drafting many new curricula. The basis for these were position task analyses (PTA's). From the PTA's, the licensee had developed both general and specific training objectives. Lesson plans were being developed based on the specific training objectives. The NRC inspector concluded that the licensee was implementing a systematic approach to training.

4. Requalification Training

The purpose of this inspection was to determine if the licensee was conducting a requalification training program for licensed and senior reactor operators which meets the requirements of 10 CFR 55, Appendix A and the approved requalification training program.

The NRC inspector reviewed licensee Procedure 1063.08, "Operations Training Program," Revision 2, dated May 31, 1983. Section 6.6 of Procedure 1063.08 was the licensee's implementation of the requalification training program. The licensee's approved requalification program had been forwarded for review by the licensee's letter of July 21, 1982, serial OCAN078211. The safety evaluation report approving this submittal was forwarded to the licensee in a joint letter from Messrs J. F. Stolz and R. A. Clark, dated December 1, 1982. The requalification training plan, which has been approved, was, in fact, an excerpt from licensee Procedure 1023.08, a now superseded training procedure. The NRC inspector compared the current implementing Procedure, 1063.08, to the approved requalification training program. There were differences between the two which are discussed in the following paragraphs.

The first significant difference between Procedure 1063.08 and the approved requalification training plan was in the requirement to inform licensed operators of changes in station design, procedures, and license conditions. This is a specific 10 CFR Part 55, Appendix A requirement, and it was reflected in the approved training program. Procedure 1063.08 was silent to this requirement except for a statement that, "preplanned lectures may be conducted . . . (on) . . . major DCP's" In practice,

the NRC inspector found that the licensee had a vigorous and apparently effective program in place to accomplish the requirement (see paragraph 2.a). Procedural requirements for this lacked specificity, however, and were contained in the design change procedure. The procedural requirements were silent to license changes.

A second area of difference between Procedure 1063.08 and the approved training program was the absence in Procedure 1063.08 of the general requirement of 10 CFR Part 55, Appendix A, paragraph 3.b. This requirement is that operators will demonstrate a satisfactory understanding of the operation of all apparatus and mechanisms and will know the operating procedures in each area for which licensed. This requirement is also in the approved requalification plan. It was noted, however, that Procedure 1063.08 did include the provision for an annual oral examination. This appeared to be an implementation of the requirement.

The third area of difference noted concerned grades on requalification lecture system examinations. The approved requalification program states that an individual should make a grade at least 80% on training conducted during requalification training. Procedure 1063.08 expanded on this requirement. In the NRC inspector's judgement, this expansion or additional interpretation might have been construed as a lessening of the original requirement. This was discussed with licensee management as a concern. Licensee management held the position that the expanded wording of Procedure 1063.08 in this area was the result of a previous inspection finding (see paragraph 2.b). The specific issue upon which the previous inspection result was based is now moot because of the approved requalification training plan. The NRC inspector reminded licensee management that the requirements of the approved requalification plan could not be altered to reduce the scope of the program without prior Commission approval. This is delineated in 10 CFR Part 50.54.

During interviews with licensee training department personnel, it became apparent that they did not have ready access to the approved requalification training plan. The NRC inspector found that the licensee records of the requalification plan submittal did not actually include the plan submitted, apparently because that enclosure was part of a procedure, then in effect and otherwise available in the record system. This Procedure (1023.08) had since been superseded; the NRC inspector was able to locate a copy of the procedure in a box of superseded procedures that were being micro filmed. It was concluded that the licensee had not done a review of Procedure 1063.08 against all the requirements of 10 CFR Part 55, Appendix A, and the approved requalification plan. The NRC inspector recalled that during NRC Inspections 50-313/83-04 and 50-368/83-04, March 14-18, 1983, a Notice of Violation was issued for the failure of the licensee to reflect a specific commitment of the Quality Assurance Topical Report in procedures. There appeared to be a common problem in these two instances - the failure to check implementing procedures against basic commitments and requirements. This is an unresolved item pending review of the licensee's review process. (50-313/8316-03 and 50-368/8316-04).

The NRC inspector reviewed the requalification training schedules for 1982-1983. It was noted that, for Unit 1, these schedules had not been approved by the Unit 1 operations superintendent except for the first five week training segment. Such approval is a requirement of licensee Procedure 1063.08. This failure to follow a procedure is an apparent violation (50-313/8316-04). It was noted from the schedules that requalification training had been conducted on a continuing basis throughout the year. From interviews with licensed operators, the NRC inspector learned that attendance at scheduled lectures was routinely good by those operators who normally were on shift. Attendance records supported this finding; however, this record review also revealed that some licensed operators, who were not regulary on shift, had failed to attend specific lectures that they were required to attend. The requalification training program requires licensed individuals, who score low on the annual examination, but who are not normally on shift, to attend remedial lectures in the areas of demonstrated weakness. This requirement also appears in Procedure 1063.08. This is a second example of failure to follow procedures in training (50-313/8316-05 and 50-368/8316-05).

The 1982-1983 examinations were reviewed. Analysis of these examinations indicated that the licensee had sampled all twelve areas delineated in the requalification training program for both units, except that there were no questions found which could be related to 10 CFR, Chapter 1, except for radiation protection questions. Requalification training schedules for both units were still in the development and approval stage. Licensee representatives indicated that training was planned for Unit 1 operators on selected portions of 10 CFR, Chapter 1, applicable to them. This is considered an open item pending review of the final requalification training schedule (50-313/8316-06).

The NRC inspector noted that for Unit 1, a detailed written analysis of the annual examination had been made and forwarded to the operations superintendent. However, the Unit 1 operations superintendent had provided only verbal input on his training recommendations and requirements. Conversely, for Unit 2, only grade summaries were forwarded to the operations superintendent in written form, with analysis apparently by verbal means. The Unit 2 operations superintendent had provided a written memorandum on training requirements for 1983-1984.

Selected lesson plans were reviewed. For those reviewed, it appeared that technical specification requirements and system inter-relationships were addressed. This was of some interest, since during interviews with operators, the NRC inspector had heard the complaint that many lectures given during requalification training were too basic in nature (i.e., did not touch on Technical Specifications). Although this apparent discrepancy between observation and interview was the possible result of the small sample sizes in both cases, it was discussed with licensee management. The NRC inspector took the position that a good lesson plan by itself did not guarantee the quality of training. It was further suggested that management involvement in training, at least to the extent to preclude violations of the type reported above, would resolve the issue and quite possibly improve the quality of training.

The NRC inspector reviewed selected written evaluations of individual operators. These evaluations were in a definitive format and provided for more information than the form previously used. It did not appear, however, that these completed evaluation forms served any real purpose other than providing an auditable record that met the requirement of 10 CFR Part 55, Appendix A. This conclusion is based on the fact that the requalification training schedules for 1983-1984 were being developed and training had commenced, but the evaluation forms had not yet been sent out. Accordingly, any information on them, when they were completed, would not be used to draw up the schedules. Training department personnel apparently did solicit and receive information from shift supervisors, but only orally. This dual system of evaluation was discussed with licensee management. It was concluded that the licensee had met the literal regulatory requirements.

There were no other questions concerning requalification training.

5. Unresolved Items

An unresolved item is a matter about which more information is required in order to determine whether it is an acceptable item, a violation or deviation.

<u>Paragraph</u>	<u>Subject</u>
3	QA/QC Indoctrination Training
4	License's Review Practice

6. Exit Interview

An exit interview was conducted July 15, 1983, with those personnel denoted in paragraph 1 of this report. The Senior Resident Inspector also attended this meeting. At this exit interview, the NRC inspector summarized the scope and findings of the inspection. Three significant points discussed were:

- ° The training department has made significant progress in the improvement of lesson plans and training techniques.
- ° Despite the overall improvement, there is some inattention to detail and to regulatory requirements as evidenced by the violations delineated in this report.