APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-298/83-32

Docket: 50-298 License: DPR-46

Licensee: Nebraska Public Power District
P.O. Box 499
Columbus, NE 68601

Facility Name: Cooper Nuclear Station

Inspection At: Cooper Nuclear Station Site, Brownville, Nebraska

Inspection Conducted: November 28-December 1, 1983

Inspector: J. K. Jaudon 12/16/83
J. P. Jaudon, Reactor Inspector, Reactor Project Section C — Date

Approved: L. G. Johnson 12/16/83
W. D. Johnson, Chief, Reactor Project Section C — Date

D. M. Hunnicutt 12/19/83
D. M. Hunnicutt, Chief, Reactor Project Section A — Date

Inspection Summary

Inspection Conducted November 28-December 1, 1983 (Report 50-298/83-32)

Areas Inspected: Routine, unannounced inspection of training and requalification training. The inspection involved 29 inspector-hours onsite by one NRC inspector.

Results: Within the two areas inspected, no violations or deviations were identified.

DETAILS

1. Persons Contacted

Nebraska Public Power District

*R. Beilke, Training Manager
T. Carson, Safety Committee Chairman
C. Goings, Regulatory Compliance Specialist
L. Roder, Administrative Services Manager
*G. Smith, Senior Quality Assurance Specialist
*P. Thomason, Division Manager, Nuclear Operations
*D. Whitman, Technical Staff Manager, Nuclear Operations

General Electric Corporation

B. Thompson, Training Manager

The NRC inspector also contacted other licensee personnel including individuals in clerical, document control, engineering, operations and training.

*Indicates presence at exit interview conducted December 1, 1983.

2. Training

The purpose of this inspection was to ascertain whether or not the overall training and retraining activities for nonlicensed employees, and general training for licensed employees were in conformance with the Technical Specifications and licensee commitments.

It was found that the licensee had made significant organizational changes with regard to training. The position of Training Coordinator, a staff assistant to the station superintendent, had been replaced by a training manager. The organizational strength of the training department was 12 people. An organization chart of the training department is enclosed as Attachment 1 to this appendix for clarity. At the time of this inspection, only 4 of the 12 department positions were filled by licensee, permanent employees. Some of the remaining positions were filled under a contract with the General Electric Company. It was also noted that the licensee had posted some of the positions and was apparently taking action to staff the organization. A training manager had been hired and was on site; however, the training manager was in training for a senior operator license. Because of the time consuming

nature of this training, the licensee also had a General Electric training manager under contract on site. The NRC inspector interviewed both training managers and observed the relationship between these two. It was concluded that this unique organizational arrangement was working effectively.

The NRC inspector noted that the licensee's Technical Specifications had not yet been updated to show the present organization. Licensee management stated that a change request had been submitted in this regard. It was also noted that two procedures reviewed in connection with the inspection had not been revised to reflect the current training organization. These procedures were:

1.2 "Station Organization and Responsibility," Revision 10 (February 24, 1983)

1.5 "Selection and Training of Station Personnel," Revision 10 (November 7, 1983)

Update of these procedures and the Technical Specifications to reflect the actual training organization is considered an open item. (298/8332-01)

The NRC inspector found that the licensee was conducting significant training for instrument and control (IC) technicians. This training was a General Electric course of 250-300 hours duration on instrument and control systems. The course was being given onsite. At the time of the inspection, the first half of the IC group was in mid-course. The second half of the IC group was scheduled for this training at the conclusion of the first group's training. It was also noted that the licensee had taken action to provide training in supervisory skills. Shift technical advisor (STA) trainees had received this training from General Electric under contract. Similar training for other site personnel had been requested by the site from the licensee district level training organization.

The NRC inspector found that STA classroom training had been completed for a new group of STAs. These trainees were standing training shifts at the time of the inspection.

The program for general employee training (GET) was reviewed. License Technical Specifications require adherence to ANSI 18.1-1971 for GET. The required elements of GET in ANSI 18.1-1971 are:

- Appropriate Plans and Procedures
- Radiological Health and Safety
- Industrial Safety
- Plant Access Areas and Security Procedures
- Use of Protective Clothing and Equipment

Training for each department in appropriate plans and procedures is specified in enclosures to licensee Procedure 1.5. Licensee representatives stated that the results of a recent training department survey indicated that the maintenance department was delinquent in this training. It was further stated to the NRC inspector that this training would be revised concurrent with the revision of Procedure 1.5. It was noted, for example, that training in the licensee procedure for tagouts to protect personnel and equipment was on each department's required reading list; however, new personnel were routinely granted unescorted access prior to gaining knowledge of this procedure. The NRC inspector found that each new employee was given a safety book during site indoctrination; however, there was no structured training program at the indoctrination. There was an ongoing program of periodic safety meetings. It was also found that, while the licensee conducted indoctrination training in the particular dangers of prenatal radiation exposures for all women, there was no program to assure that all supervisors and persons who work with women received this training, as specified in Reg Guide 8.13. Licensee representatives stated that this was not necessary since women did not work in radiation areas. The NRC inspector noted that there were women security guards on site and was told that female craft had been used as welders during the most recent refueling outage.

The NRC inspector concluded that the licensee's program for GET was marginal at best and potentially in violation of Technical Specifications. The licensee had apparently recognized many of these deficiencies, for the licensee presented them to the the NRC inspector. Additionally, the licensee described his proposed methods to correct these GET deficiencies. A key point in the corrective action was stated as the hiring of a general employee instructor of appropriate background. This staff position existed in the revised training organization. Licensee management committed to expedite filling the GET training position. The target date for completing this was March 1, 1984. This is considered an unresolved item pending further review of licensee action on GET. (298/8332-02)

It was also found that the licensee was establishing a formal station operator training program. This program, as initially operating, was in rotating segments so that new hires could enter at any of several points.

The NRC inspector had noted many changes of a positive nature in training. These included the internal recognition of problems with GET, the need to rewrite and revise many lesson plans, the reorganization, the STA training and the training of instrument and control technicians. The NRC inspector also found that there might not be total organizational support for the upgrade of training. These facts included the apparent

slowness in filling open training staff positions, the apparent problems in getting district run supervisory training and delays in getting system training for offsite engineers. This latter point was discussed in NRC Inspection Report 50-298/82-12. The NRC inspector's negative perceptions were expressed to licensee management as a concern at the exit interview. Since the licensee was classified as category 3 in training for the last SALP evaluation period and is, therefore, under an increased inspection frequency in training, an open item is not assigned herein for tracking purposes.

There were no other questions about training resulting from this inspection.

3. Requalification Training

The purpose of this inspection was to verify that the licensee was conducting requalification training in accordance with 10 CFR Part 55, Appendix A and the approved requalification training plan.

The NRC inspector reviewed the last requalification examination given. It was found that there were two examinations each for senior licensed operators and reactor operators. This was to preclude compromise since the examinations were given about two weeks apart because of the shift rotation schedule. One examination for each group was reviewed. In the NRC inspector's judgement, the two examinations reviewed appeared to sample all 11 areas required by the approved requalification training plan. It was noted, however, that the questions in thermodynamics and heat transfer were at an elemental level and that the sample of knowledge in the area of mitigation of core damage was limited. The licensee had scheduled extensive training in these subjects, and this training was being conducted.

It was found that the licensee's records for operator review of abnormal occurrence and emergency procedures indicated that senior licensed operators who are not assigned to shifts were behind schedule for the year. Since this is a required element of requalification training, this is an unresolved item pending verification that the reviews are completed within the allowed time period. (298/8332-03)

It was noted that the licensee had done a very detailed review of the last requalification examination in order to determine which subjects to emphasize in this year's training. The NRC inspector was told that the operations department had also made an input to the training schedule, but this input was apparently verbal. This schedule of requalification training had apparently been modified several times and had been regenerated in differing formats. Although this appeared on the surface to be somewhat disjointed, the NRC inspector concluded that there was substance to the requalification training program being conducted.

It was also found that many lesson plans and other supporting material were in need of revision. This had been identified by the licensee, and lesson plan revisions were being made. Records of training completed were voluminous but somewhat scattered. There were no instances found, however, in which a requested record was not available. Licensee representatives outlined to the NRC inspector their plans to organize and to codify the requalification records.

The NRC inspector sat in on part of a training class on mitigation of core damage. This course was being taught by a site engineer. During interviews with licensed operators who had recently completed this training, the NRC inspector found that this training had been well received by them. It was stated that they did need to study the text material after the lecture. The text material was not given to students prior to the lecture. This may have served to change their participation to a passive classroom role.

It was also noted that requalification lecture series tests were being given after each week's session. From attendance records it appeared that the licensee was making an effort to assure that no licensed operator missed a lecture; this was not dependent upon whether or not the operator was required to attend as a result of the last annual examination In any event, the licensee required all licensed operators to take all lecture series examinations. The number of lecture series examinations given was an increase from that observed previously at the site.

It was also noted that the licensee had determined that all instructors, whether doing requalification or other training, would, as a minimum requirement, complete a licensee course in instructor training techniques. This was stated a being as method of establishing minimum instructor qualifications and of increasing instructor communication and training skills.

The NRC inspector found that the licensee had all groups attending similator training accompanied by a training department representative holding a senior operator's license. This was considered to be an upgrade of the licensee's previous policy in this area

There were no violations or deviations identified in this area of the inspection.

4. Unresolved Items

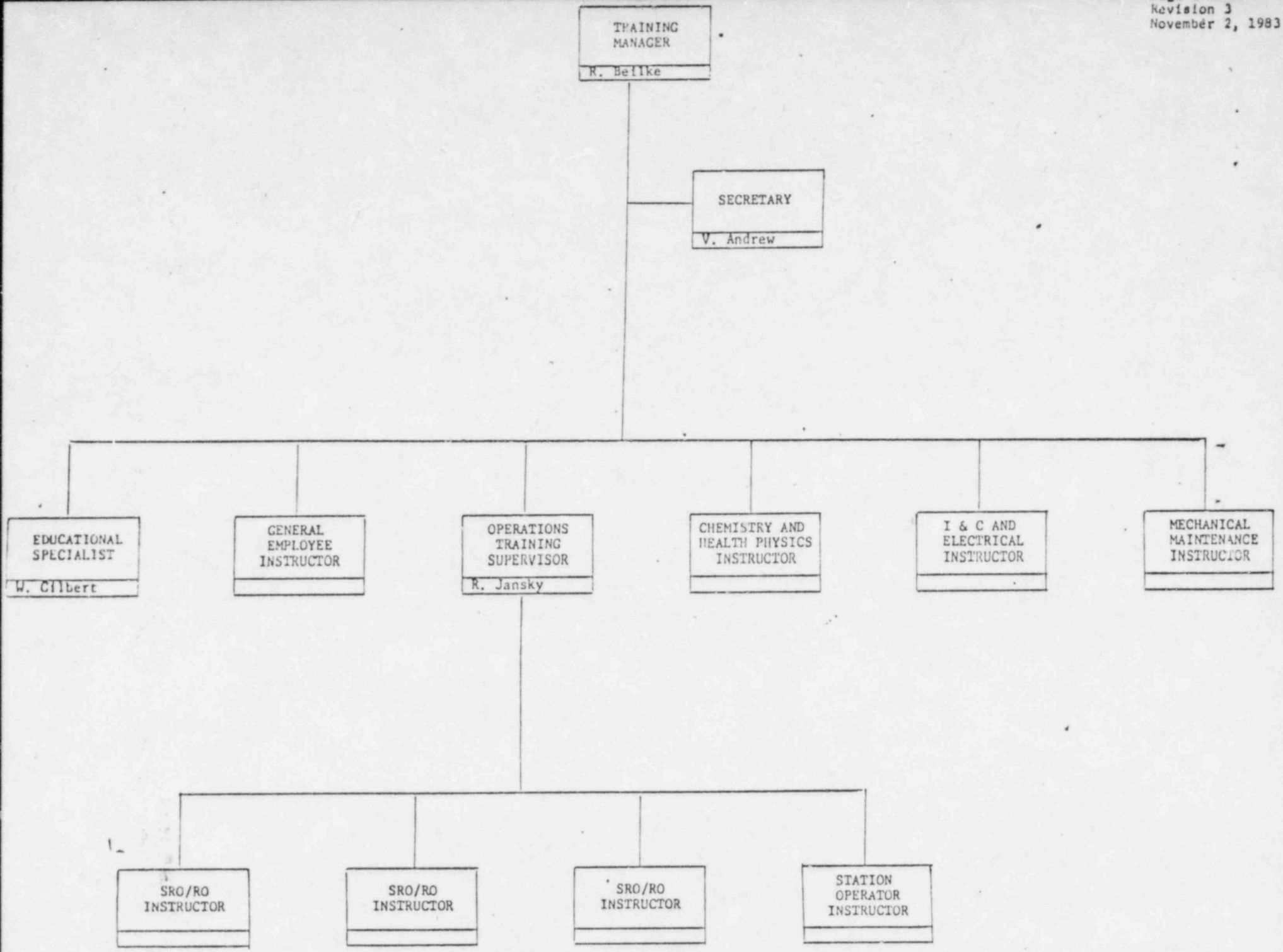
An unresolved item is an inspection finding about which more information is needed in order to determine whether the item is acceptable, a

violation, or a deviation. There were two unresolved items discussed in this report. These items were:

Number	Paragraph	Description
298/8332-02	2	Licensee action on GET
298/8332-03	3	Review of Emergency Procedures

5. Exit Interview

An exit interview was conducted December 1, 1983, with those personnel denoted in paragraph 1 of this report. The senior resident inspector also attended this meeting. At this interview, the NRC inspector summarized the scope and findings of the inspection.



Attachment 1