



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA STREET, N.W.
 ATLANTA, GEORGIA 30303

APR 18 1984

Report Nos.: 50-413/84-25 and 50-414/84-10

Licensee: Duke Power Company
 422 South Church Street
 Charlotte, NC 28242

Docket Nos.: 50-413 and 50-414

License Nos.: CPPR-116 and CPPR-117

Facility Name: Catawba

Inspection at Catawba site near Clover, South Carolina

Inspector: Bruce A. Wilson, for 3/29/84
 B. Y. Debs Date Signed

Approved by: Bruce A. Wilson 3/29/84
 B. Wilson, Section Chief Date Signed
 Operational Program Branch
 Division of Engineering and Operational Programs

SUMMARY

Inspection on February 21 - 23, 1984

Areas Inspected

This routine, unannounced inspection involved 17 inspector-hours on site in the areas of NRC Form 398 accuracy, cold certification observation training, quality assurance evaluation of operator training programs, simulator training, and procedure walk-throughs.

Results

Of the five areas inspected, no violations or deviations were identified in three areas; one apparent deviation was found in one area and one apparent violation was found in another area.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- J. W. Hampton, Station Manager
- G. G. Barrett, Training Supervisor
- *C. W. Graves, Superintendent of Operations
- W. Barron, Senior Instructor Operator Training
- J. Knuti, Operating Engineer
- J. W. Willis, Senior QA Engineer
- *S. Frye, Director of Operator Training

Other licensee employees contacted included two operators and two office personnel.

NRC Resident Inspectors

- P. H. Skinner
- K. Vandorn

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on March 8, 1984, with those persons indicated in paragraph 1 above.

3. Licensee Action on Previous Enforcement Matters

Not inspected.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Accuracy Of Information Provided On NRC Form 398 (Personal Qualifications Statement - Licensee)

The inspector performed an indepth review of two cold license applications, NRC Form 398(s), a cursory review of six other applications, and a review of a licensee performed Quality Assurance Audit of applications which was submitted by the licensee to the NRC Region II Office. The following describes the discrepancies associated with these applications:

- a. NRC Form 398 for Docket Number 20258 indicates that the candidate completed 30.6 weeks of plant systems training. The inspector observed that a 13 week segment of that training, "Systems Procedures Specific", included one week of fire brigade training and one day of physical

examinations. The inspector informed licensee management that the time relating to nonsystems training or activities cannot appropriately appear in the plant system section of the NRC Form 398 and that such incorporation results in an apparent over statement of a specific training. Licensee management acknowledged the inspector's comments and subsequently corrected the application.

- b. The inspector observed that the data presented on the applications was obtained from a computer generated printout of each candidate's training. This printout provides the licensee with course titles, dates of course completion, and total course hours. In completing the NRC Form 398 applications, licensee personnel had taken the dates of course completion and back calculated the number of course hours to derive a start date. The inspector reviewed the training summary sheets and attached training information which the licensee had originally used to input the data into the computer. It was noticed that these summary sheets include a list of attendees for each course but did not include a daily attendance record of the candidates. Licensee representatives stated that 100 percent attendance was assumed when calculating the times which were represented on the NRC Form 398(s). The inspector stated that in order to complete license applications accurately, periods of nonattendance as result of vacations, sickness, etc. must be discounted. Licensee management acknowledged this deficiency and subsequently corrected the applications.
- c. The plant's Quality Assurance Group had performed a post submittal surveillance of 9 of the 31 submitted license applications. The inspector reviewed a draft report of this surveillance. The surveillance indicated that the NRC Form 398 for Docket Number 20277 reflected 54.1 weeks of plant systems classroom training. Training records document 29.7 weeks of this type training. 14.8 weeks of simulator operations training also appeared on this application. Training records document 12.8 weeks of simulator training.

NRC Form 398 for Docket Number 20275 reflects 20 weeks of observation training. However, training records document 16 weeks.

The NRC Form 398 for Docket Number 20280 reflects 17.6 weeks of plant systems observation training. Training records document 14.6 weeks. 28.2 weeks are credited to SRO instruction. Site QA could find documentation substantiating 27.5 weeks of this training.

The Quality Assurance surveillance also identified six inaccuracies associated with the periods of training reported on submitted NRC Form 398(s). Site QA further observed that course number MC-6200 had been credited as a nuclear fundamental course on one application and as a systems course on another application.

- d. The inspector's review of selected training records indicated that a requisite cold license certification observation checklist was incomplete in that item number 5 on page 5 of the checklist had not been completed for Docket Number 20254.

For Docket Number 20277 a required observation training item also had not been completed on page 5 of the cold license certification observation checklist. The inspector also noted that the check lists contained multiple performances, observations, or discussions listed under a single topic item. In some cases a single date and set of initials appeared next to the topic item or a single subtopic. In other instances each subtopic had been initialed and assigned a date. The licensee was unsure if all the subtopics had been performed in the cases where only one date and set of initials appeared. Observation training is further discussed in section 6 of this report.

Subsequent to the inspection, the licensee withdrew their NRC Form 398 submittal and performed a complete audit of the information contained on these applications. The licensee discovered additional inaccuracies. The NRC Form 398(s) were resubmitted to the NRC at a March 8, 1984 meeting described in Section 10 of this report. On March 26, 1984, the inspector informed licensee management that the inaccuracies in prior submittals of NRC Form 398(s) represent a violation of 10 CFR 55.10(d) which requires, in part, that each application and statement shall contain complete and accurate disclosure as to all matters and things required to be disclosed; and 10 CFR 55.10(a)(6) which requires, in part, certification that the applicant has learned to operate the controls in a competent and safe manner. This certification may be provided by an authorized representative of the facility licensee where the applicant's services will be utilized. The certification must include details on courses of instructions administered by the facility licensee, number of course hours, and the number of hours of training received at the facility.

Additionally, the licensee was informed that had the NRC known the correct information at the time of the submittals, the license eligibility of the individuals applicants would not have been affected in the eyes of the NRC (VIO 50-413/84-25-01, 50-414/84-10-01).

6. Cold Certification Observation Training

Section 13.2.2.2.2(k) of the plant's Final Safety Analysis Report (FSAR) Revisions 0 through 7, states, in part, that the cold certification observation check list provides structured guidance for required observation tasks. This checklist appeared as an attachment to a cold certification program request to Mr. Paul F. Collins, NRC (OLB) from Duke Power Company dated November 2, 1977 and subsequently accepted by Mr. Collins' letter dated November 28, 1977. This observation checklist contains tasks which are identified by a single or double asterisk. The double asterisk identifies tasks which are required to be completed by a reactor or senior reactor operator candidate. The single asterisk is used to identify tasks that could have a significant impact on the candidates performance during future training but are not required to be completed.

As is stated in section 5.(d) of this report, two instances of required double asterisk items were observed not to be complete. Subsequent to this inspection, the licensee identified eleven additional double asterisk tasks which had not been completed. The licensee was informed that the thirteen instances of incomplete observation training represents a deviation by the licensee from a commitment to the NRC to perform those observations. (DEV 50-413/84-25-02, 50-414/84-10-02).

In addition to the aforementioned basic observation checklist, the licensee had expanded that checklist to include other observation, performance and discussion items which included 68 licensee identified systems. From training records, the inspector observed that very few of these additional tasks had been completed by the candidates. Interviews conducted with licensee training personnel and operator candidates indicated that these additional tasks were given to the candidates with the understanding that they were not required and could be performed if time permitted.

7. Quality Assurance Evaluation of Operator Training Programs

Revisions 0 through 7 of the Catawba FSAR Section 13.2.5 states, in part, that the Quality Assurance Department audits the station training. Interviews conducted by the inspector with plant Quality Assurance (QA) personnel indicated that the plant QA group had recently completed their first surveillance, CN-84-11, on reactor and senior reactor operator training which included a review of the information provided on NRC Form 398(s). This surveillance was performed during the week prior to this NRC inspection and after the March 8, 1984, submittal of NRC Form 398(s) by the licensee.

The inspector reviewed the report of the last Departmental Audit, NP-84-2(CN), performed by members of the corporate office in January 1984. This audit included personnel qualifications and training along with record management. Site personnel were unsure if this audit specifically looked at reactor operator training. No negative findings could be found in the report regarding the area of personnel qualifications and training. The inspector informed licensee management that the depth of Quality Assurance audits should be such that any deficiencies including those which had been identified by the inspector in the operator training program including documentation are properly identified and corrected prior to the submittal of license applications to the NRC. The licensee's efforts to perform indepth surveillances of reactor and senior reactor operator training will be inspected during subsequent inspections (IFI 50-413/84-25-03, 50-414/84-10-03).

8. Simulator Training

The inspector requested documentation regarding group sizes for Catawba simulator training programs. It was noted that from September 1983 through February 1984 group sizes had increased from three or four individuals to five and six. Revisions 0 through 7 of the Catawba FSAR Section 13.2.2.2.2(J) state, in part, that the simulator training sessions are normally conducted in groups consisting of four trainees per group.

The inspector informed licensee management that the quality of instruction may become diluted as the number in the group increases. The inspector expressed concern that the recent trend toward group sizes greater than four was becoming inconsistent with the aforementioned section of the FSAR. Licensee management acknowledged the inspector's concerns. This area of NRC concern will be inspected again during followup inspections (IFI 50-413/84-25-04, 50-414/84-10-04).

9. Procedure Walk-Through

Revision 7 of the Catawba FSAR section 13.2.2.2(j) states, in part, that simulator training is supplemented with procedure "walk-through" training at Catawba Nuclear Station. The inspector observed that the licensee had established an informal task training list in April, 1983. This list consisted of numerous training tasks identified as complete by a date and a designated signature.

Licensee personnel indicated that the walk-throughs indicated on this list had not been completed by the candidates. Those items which had been completed were usually signed off by the students. Licensee management indicated that this list was only meant as a guide for the students and that actual formal, evaluated, and documented onsite walk-through training consisted of approximately ten full days of emergency procedures evaluation. The licensee further indicated that credit for walk-through training could be given candidates on the basis of undocumented participation in procedure development system tests, and the training opportunities which were provided to the candidates to go inplant and reinforce classroom training.

10. Management Meeting

A meeting was held at the request of the licensee on March 8, 1984, in the NRC Region II Office in Atlanta, Georgia, to discuss corrective actions planned by Duke Power Company in response to this inspection.

Licensee Employees

S. R. Frye, Director of Operation Training
 C. W. Graves, Jr., Superintendent of Operations
 N. Rutherford, System Engineer, Licensing

U. S. Nuclear Regulatory Commission, Region II

H. C. Dance, Chief, Project Branch 2, Division of Project and Resident Programs

V. L. Brownlee, Section Chief, Division of Project and Resident Programs
 A. Ignatonis, Project Inspector, DPRP
 B. A. Wilson, Chief, Operator Licensing Section
 B. T. Debs, Region II Inspector
 T. Rogers, Region II Examiner

Region II NRC representatives discussed the conduct of reactor operator and senior reactor operator candidate training, accuracy of information which has been provided on NRC 398 Forms, and the findings of the February 21-23, 1984 inspection with licensee management representatives.

Commitments made by Duke Power company during this meeting were confirmed by a Duke Power Company letter to the NRC Region II Office dated March 14, 1984.