

APR 01 1983

MEMORANDUM FOR: John Stolz, Chief  
 Operating Reactors Branch No. 4  
 Division of Licensing

FROM: Harold R. Booher, Chief  
 Licensee Qualifications Branch  
 Division of Human Factors Safety

SUBJECT: EVALUATION OF GPU RESPONSE TO ASLB PID OF JULY 1982  
 ON QUALIFICATIONS OF TRAINING INSTRUCTORS

In response to the ASLB Partial Initial Decision (PID) of July 27, 1982, paragraph 2347.2, GPU Nuclear developed and submitted the TMI - Training Manual Procedure No. 6210-ADM-1340.5, Operator Training Instructor Indoctrination/Qualification Training Program to the NRC on January 25, 1983. The staff reviewed the procedure and requested additional information in the March 15, 1983 letter from J. F. Stolz, DL, to H. D. Hukill of GPU Nuclear. Additional information was obtained from a site visit by J. J. Buzy, DHFS, on March 23-25, 1983.

Our review addressed the ASLB concerns in paragraph 2347.2 of the PID which imposed the following conditions for establishing criteria for qualification of training instructors:

- "To insure a high level of competence in instruction including
  - knowledge of subjects taught
  - skill in presentation of subjects taught
  - skill in knowledge and preparation, administration and evaluation of examinations.

Our review indicates that GPU Nuclear has established a program, with two exceptions, that has answered the ASLB concerns for the TMI training staff and should provide the high level of competence in the area of training. The exceptions involve alternate means of qualification of instructors and development of guidelines and training for individuals who perform as "task-examiners."

Instructor technical qualifications for knowledge of subjects is based on a senior operator license or certification. Alternate means of technical qualifications is satisfactory completion of training or education in subjects taught at or above the level which the instructor will teach. The staff accepts instructor qualifications for senior license or certification, however, GPU should develop guidelines and criteria to support alternate evaluations of technical qualifications of instructors.

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Our review of the TMI Training Department Procedures indicate that prospective operators and instructors are evaluated by designated "task-examiners" as they complete portions of on-the-job training (OJT). Although task-examiners use detailed check-lists and procedures while performing evaluations, some tasks are not explicit and require the task-examiner to use independent judgement. The staff believes the role of task-examiner is a necessary and important portion of OJT evaluation and should be formally supported by guidelines and training. GPU should develop a program for task-examiners which will formally define their role and responsibility and also provide necessary training to assure their evaluations meet the goals of the training program.

This review was performed by J. J. Buzy, Licensee Qualifications Branch.

Original signed by:

Harold R. Booher, Chief  
 Licensee Qualifications Branch  
 Division of Human Factors Safety

cc: w/attachments  
 J. VanVliet

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 LQB Reading

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