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JUL 20 1983

MEMORANDUM FOR: Gus C. Lainas, Assistant Director
for Operating Reactors
Division of Licensing

FROM: Dennis L. Ziemann, Acting Deputy Director
Division of Human Factors Safety

SUBJECT: EVALUATION OF GPU RESPONSE TO ASLB ON QUALIFICATION
OF INSTRUCTORS (GPU LETTER OF MARCH 6, 1983)

Our memorandum of April 1, 1983, addressed the ASLB concerns for establishing criteria for qualifications of training instructors. We provided comments that the program was satisfactory with two exceptions. These included alternate means of qualification of instructors and development of guidelines and training for individuals who perform as "task examiners."

GPU revised their instructor qualification program and submitted it on May 6, 1983, to include instructor qualification criteria. We find this is acceptable and provides adequate guidance to perform evaluations of prospective instructors.

The issue of "task examiners" has been clarified by the GPU staff. Oral checkout evaluations of instructors are conducted by designated SRO licensed individuals from the assigned unit. Although GPU has not developed a formal program for task examiners, guidance for instructor oral evaluation is contained in non-licensed and licensed training programs. The programs contain detailed checklists and procedures; however, in some cases the evaluator is required to use independent judgment. We believe that an SRO licensed individual is able to use independent judgment when necessary and accomplish the prescribed evaluation.

Our review indicates that GPU Nuclear has established a program that has answered the ASLB concerns that the "Licensee should establish criteria and qualification of training instructors to ensure a high level of competence in instruction..." Details of our review are contained in the Enclosure.

This review was prepared by J. J. Buzy, LQB.

Original signed by:

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Dennis L. Ziemann, Acting Deputy Director
Division of Human Factors Safety

Enclosure:
As stated

cc: J. Van Vliet

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DATE	7/15/83	7/15/83	7/17/83	7/17/83	7/19/83		

ENCLOSURE

EVALUATION OF GPU-TMI TRAINING MANUAL
PROCEDURE NO. 6210-ADM-1340.5, OPERATOR TRAINING INSTRUCTOR
INDOCTRINATION/QUALIFICATION TRAINING PROGRAM

This review addresses the ASLB concerns in paragraph 2347.2 of the PID of July 27, 1982, 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 and knowledge in preparation, administration and evaluation of examinations."

A. Knowledge of Subjects Taught

Instructors' technical qualifications are established by having an SRO license, being SRO-certified, or by satisfactory completion of training or educational requirements as determined by the Operator Training Manager. Criteria for establishing those technical qualifications is also contained in the program. Depending on prior qualifications, the instructors may teach at various levels. These are non-licensed operator training and licensed operator (and STA) training including power plant fundamentals and theory, systems and components, transients, integrated plant responses and operating procedures. All instructors who teach operators eventually obtain an SRO license or SRO-certification and participate in requalification programs.

After initial qualification as an instructor, a formal evaluation program provides for periodic review by the instructor's immediate supervisor and other members of the training department. The program includes eight evaluations per year and provides for remedial assignments when necessary. Students are also encouraged to provide comments on course content and instructor presentation. The program establishes the technical qualification of instructors who teach operators. Instructors who teach licensed personnel are required to be SRO licensed or certified which meets the NRC requirements in NUREG-0737.

Accordingly, we conclude that the TMI-1 training instructors will possess the high level of competence in subject knowledge desired by the ASLB.

B. Skills in Presentation of Knowledge

As part of initial training, a Basic Instructor Development School is presented by the TMI Instructor staff. The course is one week in duration and presents the basic skills for developing instructional objectives, performing a training analysis, developing and presenting lesson plans. The responsible instructors are revising the current program to include more emphasis in presentation of lesson plans, and are also addressing the needs of individual instructors who receive any marginal evaluations from periodic evaluations.

The Training and Education section is developing additional guidance for entry level instructors for all training groups. This will provide more formal indoctrination in the use and presentation of lesson plans or exercises. Initial indoctrination and development of instructional skills is provided in the program. In addition, the program includes periodic evaluation of instructor presentation by the training department management. Continuing training in instructional knowledge is also provided in the program.

We consider that this training in subject matter presentation will assure that instructors possess the requisite skill in presentation techniques.

C. Skill and Knowledge in Preparation, Administration and Evaluation of Examinations

Preparation, administration and evaluation of examinations are contained in the Training Department Administrative Procedures. Instructors are provided guidance for development of examinations and are periodically evaluated by supervisors under the instructor evaluation program. Administrative procedures provide direction in the administration and evaluation of examinations.

We consider that this instruction and guidance will enable the instructors to properly prepare, administer and evaluate examinations.

Conclusion

Based upon our review of the Operator Training Instructor Indoctrination/Qualification Program, we conclude that GPU Nuclear has developed a satisfactory program to provide indoctrination, training and certification of instructors, including continuing training and participation in applicable requalification programs.