



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA STREET, N.W., SUITE 2900
 ATLANTA, GEORGIA 30323-0199

Report Nos.: 50-325/18 and 50-324/18

Licensee: Carolina Power and Light Company
 P. O. Box 1551
 Raleigh, NC 27602

Docket Nos.: 50-325 and 50-324

License Nos.: DPR-71 and DPR-62

Facility Name: Brunswick Steam Electric Generating Plant Units 1 and 2

Inspection Conducted: September 11-15, 1995

Inspector: George T. Hopper 10-12-95
 Date Signed

Accompanying Personnel: R. Aiello

Approved by: Thomas A. Peebles 10/13/95
 Date Signed
 Thomas A. Peebles, Chief
 Operations Branch
 Division of Reactor Safety

SUMMARY

Scope:

The NRC conducted a routine, announced inspection of the Brunswick licensed operator requalification program during the period September 11-15, 1995. The inspectors reviewed and observed annual requalification examinations conducted by the facility licensee and conducted inspection activities as specified in Inspection Procedure 71001, "Licensed Operator Requalification Program Evaluation." Activities reviewed included examination development and administration, remedial training, and operator performance.

Results:

The inspectors concluded that the licensee's requalification program for ROs and SROs was adequate to ensure safe power plant operation.

The inspectors identified a Non-Cited Violation (NCV) concerning the failure to notify the NRC within 30 days that an operator no longer needed a license. This failure constitutes a violation of minor safety significance and is being treated as non-cited violation, consistent with Section IV of the NRC Enforcement Policy.

The inspectors also identified an NCV regarding the failure to maintain adequate documentation of additional training for this operator which was required prior to his return to licensed duties (paragraph 3.). This failure constitutes a violation of minor safety significance and is being treated as non-cited violation, consistent with Section IV of the NRC Enforcement Policy.

In the areas inspected, no other violations or deviations were identified.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *G. Barnes, Manager, Training
- *T. Harris, Regulatory Programs Lead
- *D. Hicks, Manager, Regulatory Affairs
- *G. Honma, Manager, Licensing and Regulatory Programs
- *W. Levis, Director, Site Operations
- *R. Lopriore, Plant Manager
- *J. Lyash, Manager, Operations
- *H. McDaniel, Supervisor, Licensed Operator Requalification

Other licensee employees contacted included instructors, operators, and office personnel.

NRC Personnel

- *P. Byron, Resident Inspector
- *M. Janus, Resident Inspector

*Attended exit interview

2. Licensed Operator Requalification Program Evaluation (71001)

a. Summary

The NRC conducted a routine, announced inspection of the Brunswick Steam Electric Plant Units 1 and 2 licensed operator requalification (retraining) program during the week of September 11, 1995. The purpose of the inspection was to verify that the licensee's requalification program for Reactor Operators (ROs) and Senior Reactor Operators (SROs) ensures safe power plant operation by evaluating how well the individual operators and crews had mastered training objectives. Based on a review of records and observation of both written and operating examinations, the requalification examination activities were satisfactorily conducted.

b. Examination Development

The inspectors reviewed the licensee's requalification written and operating examinations by comparing them to the guidelines provided in the licensee's procedures and the criteria contained in Inspection Procedure 71001, "Licensed Operator Requalification Program Evaluation." The inspectors found that the licensee-developed examinations were satisfactory.

(1) Sample Plan

The inspector reviewed the sample plan for the requalification cycle and the facility's guidance for development and use of the sample plan. The inspector noted that the facility developed and used the sample plan consistent with the guidance of ES-601, "Conduct of Requalification Examinations," and ES-603, "Requalification Walk-Through Examination." The sample plan contained all of the required elements to develop comprehensive, valid examinations. Test outlines closely paralleled the distribution of material covered during the requalification cycle.

(2) Written Examinations

The inspectors reviewed several written examinations, balancing them against the guidance contained in ES-602-1, "NRC Checklist for Open-Reference Test Items." The examinations met the elements of the checklist with only a few discrepancies. Overall, the part "A" and "B" exams were found to be satisfactory. However, several questions were noted to contain implausible distractors which were easily eliminated, thereby making the question less challenging. Each exam that was reviewed, contained a small percentage of questions that were non-discriminating. Questions which do not discriminate between a competent and non-competent operator impede the ability of the licensee to identify areas in which retraining is necessary. The ability to identify areas in which retraining is needed to upgrade operator knowledge is one of the regulatory bases for administering the exams [10 CFR 55.59(c)(4i)].

(3) Operating Tests

The inspectors reviewed a sampling of scenarios administered during the present examination cycle using the guidelines contained in ES-604. The simulator scenarios reviewed were challenging and at the appropriate level of difficulty. The inspectors also reviewed the Job Performance Measures (JPMs) used during the examination. The inspectors found that the licensee had developed and administered satisfactory operating examinations.

c. Examination Administration

The inspectors observed examination activities to assess the licensee's effectiveness in conducting operating tests. The inspectors focused on operating test content, evaluators' use of

performance standards, compliance with procedures, security measures implemented, and documentation of results. The inspectors concluded that the licensee adequately evaluated the operators' performance as required by 10 CFR 55.4 and 10 CFR 55.59.

The inspectors observed the training department evaluators and licensed operators during simulator examination scenarios to determine if the scenarios were administered in accordance with procedural guidelines. The evaluators identified weaknesses and asked questions of the operators as needed to obtain clarification of actions taken during the examination process. The evaluators held a caucus following each scenario to discuss the strengths and weaknesses associated with individual and crew performance. The inspectors noted that the facility evaluators observed, analyzed, and recorded crew and individual performance discrepancies in a satisfactory manner. Upon completion of the operating test, each crew was debriefed on the results. The inspectors also monitored administration of the Job Performance Measures (JPM). The staggering of operators and the administration of the JPM portion of the examination was conducted by the facility efficiently, orderly, and in a manner which ensured examination security. The inspectors concluded that the evaluators administered the operating tests satisfactorily.

d. Operator Performance

The inspectors observed licensed operators' performance during simulator scenarios and JPMS. The inspectors determined that the licensee's requalification program effectively trained licensed operators on subject areas identified in 10 CFR. The JPMS and simulator scenarios administered to the operators included many of the subject areas identified in 10 CFR 55.59. The operators performed satisfactorily during the simulator scenarios and JPMS and completed all of the assigned critical tasks. Communication between the shift supervisors (SS) and other control room personnel was adequate. The SROs did a satisfactory job of directing activities during scenarios, and the ROs were able to locate and operate equipment effectively.

e. Remedial Training Program

The inspector reviewed the licensee evaluations of previously administered written and operating remedial training (January through September 1995), in accordance with inspection procedure 71001, to verify that the training department had adequately addressed licensed operator and crew performance weaknesses as required by 10 CFR 55.59, and 10 CFR 55.4. The facility evaluators had effectively identified individuals and crews that required remediation and had appropriately indicated when removal from shift duties was warranted.

The inspector reviewed the facility's procedure for remediation (TM-1.05, "Student Counseling and Remedial Training") and their remediation packages for several individuals and crews. The licensee was effectively using the remediation program. However, the inspector

identified that Procedure TM-1.05 did not direct any post remedial student/crew performance assessment. Furthermore, several remedial training plans failed to contain any post remedial evaluation (i.e., the operator was only required to review procedures/systems or perform a certain degree of self-study without a final assessment from an instructor or supervisor). The licensee revised the procedure before the inspectors left the site, to require a post remedial assessment as part of the remedial training plan.

3. Conformance With Operator License Conditions

The inspectors reviewed the training and other administrative documentation concerning one SRO who had ceased performing license duties in April 1992 and was reinstated to perform license duties in August 1993. The individual had been transferred to the Nuclear Engineering Department (NED) in Raleigh in April 1992. He was temporarily assigned as the Brunswick Unit One Operations Manager in October. In November 1992, a letter was sent to Region II NRC requesting the termination of his and two other SRO licenses. This letter was unable to be located in the Region II administrative files and the license terminations were never performed. In February 1993 the individual was transferred back to the Brunswick Site and promoted to the position of Operations Manager. Licensee management desired for him to have an active SRO license. On May 14, 1993, the licensee submitted a letter (serial No. BSEP 93-0068) requesting that the individual's license be maintained as originally issued, since it was never terminated, with the original expiration date of December 21, 1995. This letter also contained another request for the license terminations of the other two individuals previously mentioned. The NRC agreed to this request in a June 15, 1993, letter to the licensee with the stipulation that the individual successfully complete a remedial training program and pass the 1993 requalification examination prior to resuming license duties.

The inspectors noted the following discrepancies with regards to compliance with 10 CFR requirements:

- a. 10 CFR 50.74 required that the licensee notify the Commission in accordance with § 50.4 within 30 days if the licensee permanently reassigns a licensed operator or senior operator from a position for which the licensee has certified the need for a licensed operator or senior operator under § 55.31(a)(3). The inspectors noted that the licensee had submitted the first notification (request for license termination) to the NRC on November 24, 1992. The licensee had permanently reassigned the individual to Raleigh NED in April 1992. This submittal was over 6 months past due for the 30 day notification requirement. This failure to notify the NRC within 30 days constitutes a violation of minor safety significance and is being treated as a Non-Cited Violation (NCV 50-325,324/95-18-01), consistent with Section IV of the NRC Enforcement Policy.
- b. 10 CFR 55.59(c)(5)(i) required, in part, that the facility licensee shall maintain records documenting the participation of each licensed

Enclosure

operator and senior operator in the requalification program. 10 CFR 55.59(b) required that if the requalification program requirements are not met, the Commission may require the licensee to complete additional training and to submit evidence to the Commission of successful completion of this training before returning to license duties. The inspectors noted that the licensee was unable to provide documentation of the satisfactory completion of the individuals remedial training program contrary to the requirements stated above. However, the inspectors did note that the individual successfully passed the 1993 requalification examination. The individual verified that he had, in fact, completed a self-study package for the requalification topics that he had missed. The failure to maintain adequate documentation of additional remedial training constitutes a violation of minor safety significance and is being treated as a Non-Cited Violation (NCV 50-325,324/95-18-02), consistent with Section IV of the NRC Enforcement Policy.

4. Action on Previous Inspection Findings (92901)

(Closed) IFI 50-325,324/94-23-01, "Licensee's lack of effectiveness in conducting retraining on problem areas which did not reach a failure threshold." The licensed individual evaluation reports documented similar types of problems each week during requalification. However, there was no evidence of structured retraining in these areas. This precluded identifying trends of declining performance. The previous inspector's review (documented in NRC Inspection Report 50-325,324/94-23) of the licensee's Adverse Condition Reports (ACRs) showed that the same type of errors occurred in the plant on a regular basis. The inspector reviewed Procedure TM-4.01, "Licensed Operator Retraining Program" (LORP), which had been revised (Rev 18) to reflect the facility's new training requirements. This procedure now requires a detailed "Roll-up" report summarizing operator performance if any significant performance deficiencies are identified. The report must include information regarding operator basic skill competencies to allow trending of operator performance while in training. Furthermore, after each requalification examination, a report is written based on a complete and detailed exam analysis for all portions of the examination. The operations department reviews the results and makes any necessary comparisons with the Corrective Action Program System (CAPS) database. The inspector reviewed the CAPS 94-01442 and the 1995 Condition Reports. The inspector concluded that the facility was adequately tracking and trending the areas that needed improvement.

5. Exit Interview

At the conclusion of the site visit, the inspectors met with representatives of the plant staff listed in paragraph one to discuss the results of the inspection. The licensee did not identify as proprietary, any material provided to, or reviewed by the inspectors. The inspectors further discussed in detail, the inspection findings listed below. The licensee did not express any dissenting comments.

| <u>Item Number</u> | <u>Status</u> | <u>Description and Reference</u> |
|-------------------------|---------------|--|
| NCV 50-325,324/95-18-01 | Closed | Failure to notify the NRC within 30 days of the permanent reassignment of a licensed operator (paragraph 3.a) |
| NCV 50-325,324/95-18-02 | Closed | Failure to maintain adequate documentation of additional remedial training (paragraph 3.b). |
| IFI 50-325,324/94-23-01 | Closed | Licensee's lack of effectiveness in conducting retraining on problem areas which did not reach a failure threshold (paragraph 4.). |