

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-454/84-61(DRS); 50-455/84-42(DRS)

Docket Nos. 50-454; 50-455

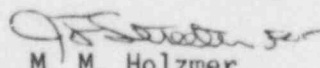
Licenses No. CPPR-130; CPPR-131

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

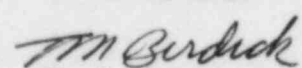
Facility Name: Byron Nuclear Power Station Units 1 and 2

Inspection At: Byron, Illinois

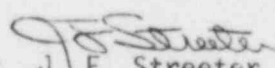
Inspection Conducted: September 10-14, 1984

Inspectors:  M. M. Holzmer

10-15-84


T. M. Burdick

10-15-84
Date

Approved By:  J. F. Streeter, Director
Byron Project Division

10-15-84
Date

Inspection Summary

Inspection on September 10-14, 1984 (Reports No. 50-454/84-61(DRS);
50-455/84-42(DRS))

Areas Inspected: Routine announced inspection by region-based inspectors of licensee action on previous inspection findings; and operating staff training. This inspection involved a total of 60 inspector-hours by 2 NRC inspectors including 0 inspector-hours during off-shift.

Results: Of the two areas inspected no items of noncompliance or deviations were identified.

DETAILS

1. Persons Contacted

Commonwealth Edison Company

- *D. Cooper, General Instructor
- *A. Snow, General Instructor
- *L. M. Johnson, QA Engineer
- *P. M. Anthony, Technical Staff
- *R. Pleniewicz, Assistant Superintendent of Operations
- *T. K. Higgins, Training Supervisor
- *W. Burkamper, QA Supervisor
- *R. E. Querio, Station Superintendent

USNRC

- *K. A. Connaughton, Resident Inspector
- *P. G. Brochman, Resident Inspector

The inspectors also interviewed several other licensee employees including operators, craftsmen, instructors, engineers and clerical personnel.

*Denotes those present at the September 14, 1984 exit interview.

2. Licensee Actions on Previously Identified Items

(Closed) SER Item No. 454/83-00-20: Operator training for safe operation of the facility and restoration of AC power following a station blackout is required by fuel load date. The inspectors reviewed the lesson plan and training records for seven operators and determined that all had received the required training. This item is considered closed.

(Closed) Open Item Nos. 454/84-19-02 and 455/84-14-02: Operators need training to perform local valve manipulations required by the licensee's Emergency Procedures. The inspectors reviewed training records for all equipment attendants and determined that they had received the required training. The inspectors also reviewed the lesson plan and determined it to be acceptable. This item is considered closed.

3. Operating Staff Training

The inspector verified by interview and the review of programs and records that a documented retraining program consistent with the FSAR and 10 CFR 55 Appendix A for licensed personnel has been established.

Through interviews, lecture attendance and the review of programs and records the inspector verified that a documented program has been established for indoctrination and retraining licensee personnel in administrative controls, radiological health and safety, controlled

access and security emergency plan, industrial safety, fire fighting, quality assurance and prenatal radiation exposure for female employees.

The inspector also attended a one hour lecture and reviewed the lesson plan for equipment attendant training.

Additionally through interview and review of schedules and records the inspector verified that responsibility for training program administration and evaluation has been assigned; that initial training programs have been implemented; and training records reflect actual training received.

a. Documentation Reviewed

Byron Training Procedures - 100 through 500 series
Byron Administrative Procedures - 600 series
Primary Water System lesson plan
Station Blackout lesson plan
Manual Valve Operations lesson plan
Emergency Procedures lesson plan
General Employee Training Program
Training Records

b. Findings

No noncompliances or deviations were noted.

c. Discussion

After reviewing the records of 22 employees selected at random, the inspector determined that there were 22 instances of failure to complete training required by the training matrix. This training included out-of-service cards, hold cards, respiratory apparatus, total job management and cardiopulmonary resuscitation. Failure to complete training as required by station procedures is considered an open item (50-454/84-61-01; 50-455/84-42-01).

During a review of the general employee training program the inspector determined that all employees are directed to report fires and, if possible, to extinguish fires. The program does not include training in the use of fire extinguishers however. The licensee stated that although the program does not include fire extinguisher training the instructor provides a demonstration on the types of fire extinguishers available and their application as a supplement to the standard presentation.

Failure to include fire extinguisher training in the general employee training program is considered an open item (50-454/84-61-02; 50-455/84-42-02).

Licensed RO and SRO requalification training records were not stored in two hour fire rated containers as required by Regulatory Guide 1.83, Revision 2. This is considered an open item (50-454/84-61-03; 50-455/84-42-03).

Licensed reactor operator (RO) and senior reactor operator (SRO) required reading was performed in accordance with BTP 100-10, "Required Reading Program", which specified that required reading assignments be completed by the date indicated on the routing sheets. The completion date was typically 3 weeks after the issue date. A sample of required reading packages indicated that several ROs and SROs had not completed the required reading by the assigned completion date. Some of these were still outstanding at the time of the inspection. BTP 100-10 was revised in April 1984, to install the current system. Although the new system was an improvement on the original system, there was no administrative control available to the training department to ensure that delinquent employees complete their required reading. Failure to keep current on required reading is considered an open item (50-454/84-61-04; 50-455/84-42-04).

Byron Training Procedures (BTPs) establish training requirements for station personnel (usually through training matrices). The training matrices are a set of computer printouts which list for each station employee, the applicable training courses, whether the course is required, when it was completed, and when it is due again (if required). BTPs typically establish training requirements by stating that persons to receive the training shall be identified in the training matrix. BTPs are reviewed and approved by the onsite review group and the station superintendent. The training matrices are established by agreements between the Training Department and the appropriate work groups, but do not receive onsite review or approval by the station superintendent. Failure to provide adequate review and approval of training requirements is an open item (50-454/84-61-05; 50-455/84-42-05).

Inputs to the training matrices take from two weeks to three months. In the meantime, records of completed training are maintained in hard copy, thus providing availability of records. The lag time, however, detracts from the convenience of the Training Matrices as a management tool.

Two procedures exist which cover Quality Assurance (QA) Training, BAP 600-6, "Byron Station Quality Assurance Training Program", and BTP 400-1, "Quality Assurance Training Program". BAP 600-6 was intended to establish requirements for QA training, and BTP 400-1 was to be the implementing document. Comparison of these procedures led to confusion regarding the intent of the two procedures. Since there are plans for QA training to be revised in the future, revisions to these procedures to make them more compatible would be considered an improvement.

The inspector determined that the training staff responsible for scheduling training sessions uses a variety of methods. To help ensure continuity is maintained in the scheduling process, especially following a reassignment of that responsibility, a procedure should be developed for that purpose.

The inspector reviewed several lesson plans and examinations and found their contents and format acceptable. A procedure for lesson plan and examination review and approval does not exist. Such a procedure would help ensure uniform implementation of these items.

4. Open Items

Open items are matters which have been discussed with the licensee, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or licensee or both. Open items disclosed during the inspection are discussed in Paragraph 3.c.

5. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) throughout the inspection period and at the conclusion of the inspection on September 14, 1984 and summarized the scope and findings of the inspection activities. The licensee acknowledged the inspector's comments.