

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-458/84-11

CP: CPPR-145

Docket: 50-458

Priority: A2

Licensee: Gulf States Utilities
P. O. Box 2951
Beaumont, Texas 77704

Facility Name: River Bend Station, Unit 1

Inspection At: River Bend Station, St. Francisville, Louisiana

Inspection Conducted: June 25-29, 1984

Inspectors:

M. E. Murphy
M. E. Murphy, Reactor Inspector
Special Projects and Engineering Section

7/23/84
Date

C. C. Harbuck
C. C. Harbuck, Reactor Inspector
Reactor Project Section A, Project Branch 1

7/23/84
Date

Approved:

R. E. Ireland
SR R. E. Ireland, Acting Chief, Special Projects and
Engineering Section

7/25/84
Date

J. P. Jaudon
Frd J. P. Jaudon, Chief, Reactor Project Section A
Project Branch 1

7/27/84
Date

Inspection Summary

Inspection Conducted June 25-29, 1984 (Report 50-458/84-11)

Areas Inspected: Routine, announced inspection of operational staffing, personnel qualification, and training. The inspection involved 68 inspector-hours onsite by two NRC inspectors.

Results: Within the two areas inspected, no violations or deviations were identified.

DETAILS

1. Persons Contacted

GSU Personnel

- *T. Crouse, QA Manager
- *P. Dantel, Licensing Staff Assistant
- *J. Deddens, Vice President, River Bend Nuclear Group
- *P. Gillespie, QA Engineer
- *T. Gray, Director, Operations QA
- *J. Hamilton, Supervisor, Site Engineering
- *R. Helmick, Project Engineer
- *K. Hodges, Supervisor, Quality Systems
- *S. Marino, Nuclear Training Assistant
- *W. Odell, Director, Nuclear Training
- *D. Sharp, Nuclear Project Engineer, Mechanical
- *J. Spivey, QA Engineer
- *R. Stafford, Director, Quality Services
- *R. Taylor, QA Engineer
- *P. Tomlinson, Supervisor, Operations QA
- *M. Walton, Technical Assistant to the Project Engineer

Stone & Webster

- *J. Zullo, QA Administration

The NRC inspectors also interviewed additional clerical and training staff personnel.

*Denotes those present at the exit interview on June 29, 1984.

2. Operational Staffing and Personnel Qualifications

This inspection was conducted to review the status of staff manning and the adequacy of personnel qualifications for specific staff positions. The applicant has committed, in Chapter 13.1 of the FSAR, to meet the requirements of ANSI/ANS 3.1-1978, "Selection and Training of Nuclear Power Plant Personnel."

The NRC inspector reviewed the published organization charts against the organizational structure defined in the FSAR and found them to be in agreement. However, all positions are not yet filled. The following list identifies the positions and the number of openings in each for which specific personnel assignments have not been made:

<u>No. of Openings</u>	<u>Title</u>
1	Plant Manager
4	Senior Systems Engineer
5	Shift Supervisor (SRO)
2	Control Operating Foreman (SRO)
9	Nuclear Equipment Operator
2	Senior Health Physicist
5	Radiation Protection Technician
1	Radiation Health Supervisor
3	Nuclear Chemical Technician
1	Environmental Specialist - Radiation
1	Mechanical Foreman
3	Repairman (Mechanical)

Pending personnel assignments by the applicant to fill these positions, and a review by the NRC of personnel qualifications for those assigned, this is considered an open item (50-458/8411-01).

The NRC inspector reviewed the applicant's procedures ADM-0007, "Selection, Training, Qualification and Evaluation of Plant Staff Personnel," Revision 0, dated January 30, 1984, and RBPP 1.8, "Qualification and Training Records," Revision 3, dated March 13, 1984. This review verified that the applicant has established qualification requirements in accordance with ANSI/ANS 3.1-1978. The review further determined that it is the intent of the applicant that the training record personnel file shall contain the individual's documented qualifications in the areas of education and experience and that these be verified by the personnel department. This verification is supposed to be documented by the signature of a personnel department representative on a form entitled "Certificate of Qualification" along with copies of the verifications which shall be included in the employee's training record.

During review of selected personnel training record files for management, engineering, licensed and unlicensed operators, technical support personnel, technicians, and craftsmen, the NRC inspector found that very few contained all required documents. This review did confirm that most of the individuals met or exceeded the specific job qualifications. However, in those cases where an element was missing, such as a degree, there was no documentation that this had been reviewed and exempted or waived by management.

Pending a thorough review of all personnel training files and attainment of full compliance with the controlling procedures, this will be considered an open item (50-458/8411-02).

The NRC inspector reviewed the quality assurance/quality control organizational structure, as presently published, against the FSAR. The applicant's QA program is contained in Chapter 17.2 of the FSAR. With

acceptance of Amendment 13 to the FSAR, submitted the week of June 25, 1984, the published organization will agree with the FSAR.

Qualifications of QA/QC personnel in the following positions were reviewed: managers, supervisors, auditors, technicians, and inspectors. The records indicate that the individuals meet or exceed the requirements; however, the same documentation problems exist with these records as discussed in the preceding paragraphs.

No violations or deviations were identified in this area of the inspection.

3. Operating Staff Training

The purpose of this inspection was to verify that the applicant is training the operating staff as committed to in RBS FSAR Section 13.2.

- A. Selected training records were reviewed to verify implementation of the initial training programs. The NRC inspector was unable to perform a meaningful review of these records due to the apparent lack of a documented training program.

A documented training program consistent with FSAR training commitments for the principle plant staff and personnel scheduled for licensing apparently has not been established.

Procedures to implement the FSAR training commitments have not been issued. Consequently, precise definitions of training requirements have not been established. This is reflected in the training records. Correlation of the training courses described in FSAR Section 13.2 with training records proved to be difficult, since in most cases only lecture or seminar titles (which are not always uniform from record to record) are listed with no reference to what course of instruction they are part of, using the FSAR numbering system. RBPP 1.8, Revision 3, "Qualification and Training Records," states that "these records provide the means of documenting an individual's qualifications for their position and work functions." The FSAR specifies who receives each course of instruction, but does not specifically state, by position, what training is required to qualify for that position. RBPP 1.8, Revision 3, states that this function is the responsibility of the section supervisors who "prepare a qualification matrix for each section position description, in accordance with their department qualification procedure." These qualification matrices are, in practice, wall charts that have apparently not undergone proper review and approval. The matrix for cold license operator candidates was reviewed and found to be inaccurate and incomplete. Some persons were shown as having completed Phase II/Fundamentals II training (designated A2 in

the FSAR) when in fact what they attended, according to their training records, was a GSU indoctrination course.

The Advanced Technical Principles for the SRO course, designated (A3), was missing from the matrix. The NRC inspector was told that 22 individuals had completed the classroom portion of this course, which was conducted by Memphis State University. However, the course additionally requires independent study resulting in submission of two research papers, and no one had completed this portion yet. The applicant's position was that the independent study was not necessary and that the classroom instruction satisfied the requirements for STA training.

The NRC inspector was informed by applicant representatives that the cold license operator qualification matrix was being used as a planning tool only. Apparently then, the individual training records must be relied upon to determine qualification requirements and status. The NRC inspector found that this could not be done. The training records apparently do not satisfy their designated function stated in RBPP 1.8, Revision 3 of "documenting an individual's qualifications for their position and work functions."

This item remains open pending review of all procedures designed to implement FSAR Section 13.2, a reinspection of the training records, a review of all department qualification procedures, and the associated qualification matrices (50-458/8411-03).

B. The program for indoctrinating licensee personnel was reviewed. An applicant representative stated that the actual general employee training (GET) program was not designated to begin until October 1984. Currently, all employees are required to attend a project indoctrination course. The NRC inspectors attended this course. The following areas were found to be presented satisfactorily for a construction site:

- Quality assurance program
- Controlled access and security
- Industrial safety
- Administrative controls

The following areas are not complete or not yet included in the program:

- Radiological Health and Safety
- Emergency Plan
- Firefighting
- Instruction concerning prenatal radiation exposure for female employees

This item remains open pending review of the GET program lesson plans when completed (50-458/8411-04).

- C. The on-the-job training program was not found to be fully defined. Apparently, some OJT has occurred as records of it were found in some training records. But as yet, a procedural basis for it for applicable staff positions and qualifications does not exist beyond what is described in FSAR 13.2.2.3.3 for licensed RO's and SRO's. This item remains open pending issuance and review of applicable procedures and training plans, and inspection of OJT in progress and subsequent documentation in training records (50-458/8411-05).
- D. Responsibilities for administering and evaluating the training program in the following areas were verified to have been assigned:
- Training program for the principal plant staff and personnel scheduled for licensing
 - General employee training
 - On-the-job training

The FSAR states that the overall training program for the plant staff is the responsibility of the Vice President - Administration. The details of the training programs and their administration are the responsibility of the training director, who delegates the responsibility for implementation of specific programs to individual discipline coordinators. They are responsible for quality and adequacy of the program content, material development, presentation, examinations, performance evaluation, scheduling, and documentation of each respective program.

The nuclear training coordinators are:

- License
- Maintenance
- Technical
- General employee training (GET)

Training for QA/QC is described in OQM-1.5 and at present does not come under the responsibility of the training director, but is ultimately the responsibility of the QA manager.

An applicant representative stated that this responsibility is planned to be transferred to the training department at some future date.

Fire protection training is apparently the specific responsibility of the senior engineer for fire protection and includes general fire protection training for all employees as part of GET, fire brigade training, and offsite fire department training. Its administration comes under the responsibility of the nuclear training coordinator for GET.

Likewise, the responsibility for emergency preparedness training is under the nuclear training coordinator for GET.

Within the scope of this inspection no violations or deviations were identified.

4. Exit Interview

An exit interview was conducted June 29, 1984, with the personnel denoted in paragraph 1 of this report. The NRC senior resident inspector also attended this meeting. At this meeting the scope of the inspection and the findings were summarized.