



ENTERGY

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April 17, 1992

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Response to Grand Gulf Nuclear Station Examination
Report No. 50-416/92-300

GNRO-92/00042

Gentlemen:

During the week of January 27, 1992 the Nuclear Regulatory Commission (NRC) administered examinations to employees of Entergy Operations who had applied for licenses to operate Grand Gulf Nuclear Station. Subsequently, the NRC issued the subject Grand Gulf Nuclear Station examination report. The test report indicated that five of nine candidates failed to achieve the minimum requirement necessary to obtain an operating license. The report further indicated that the 55 percent failure rate for the candidates tested was considered a high failure rate and that the average candidate performance was considered low. Additionally, it was noted that Grand Gulf was the only facility in the nation to have a failure on the February 1992 Generic Fundamentals examination. The NRC requested information concerning plans to address these trends.

Entergy Operations is concerned with the results of this examination and will dedicate the appropriate level of management attention to preclude a recurrence during future license examinations. Attached is the plan to address the low candidate performance and examination pass rate.

Should you have any questions concerning this response please contact this office.

Yours truly,

W. T. Cottle

WTC/WBB/mtc

attachment: Response to Examination Report No. 50-416/92-300

cc: (See Next Page)

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RESPONSE TO EXAMINATION REPORT NO. 50-416/92-300

The management of GGNS shares the concerns identified in Examination Report 50-416/92-300. Accordingly, we are taking a number of steps to aggressively address these concerns while conducting further investigations to identify fundamental causes.

Following the examination week of January 27, 1992, self assessment processes were initiated to identify problem areas associated with the training of the January license class. A Quality Principles and Practices (QP&P) session was scheduled which included participation of training supervision, training instructors, and six candidates from the license class. The Nuclear Assurance Department from our corporate office, although previously scheduled to perform an assessment of operator training in general, was provided specific objectives to evaluate. This assessment provided additional insight into the low performance of the license class.

Upon receipt of the examination report, additional activities were undertaken. Numerous interviews with Operations and Training personnel were performed to provide insight to perceived program problem areas. Detailed examination analysis was performed on the January license written examination and the June 1991 and February 1992 Generic Fundamentals Examinations (GFES). A root cause analysis by an independent group was initiated. The final report from the analysis will be issued at the end of April, 1992.

Based on the assessments performed, the following improvements to the License Operator Training Program are being pursued.

A. GENERIC FUNDAMENTALS EXAMINATION

Through candidate interviews and the QP&P, it was identified that the course scheduling needed modification. Fast scheduling practices resulted in systems being taught immediately following Fundamentals. With the establishment of the GFES examination schedule, the GFES exam dates occurred after systems training had commenced, resulting in the class having to stop systems training to take the GFES exam. Course scheduling has been adjusted to allow completion of Fundamentals, including the GFES exam, prior to the start of systems training. Also, the candidates expressed a concern that too much information was being presented in the time frame allotted. Consequently, the general schedule for Fundamentals training has been adjusted to allow additional time for self study.

Originally, GGNS adopted a 70 percent pass/fail criteria which was consistent with the then current NRC standard. The NRC standard was subsequently raised to 80 percent (pass/fail). In response GGNS adopted a standard which allowed the total scores of the weekly examinations to average 80 percent. Based on recent candidate performance on GFES examinations, the 80 percent average standard has been deemed inappropriate. The GGNS standard for weekly exams has therefore been raised to match the NRC criteria of 80 percent.

RESPONSE TO EXAMINATION REPORT NO. 50-416/92-300 (Continued)

Our analysis of the June 1991 and the February 1992 GFES examinations indicated weaknesses in electrical science and instrumentation and controls. The length of these modules is being increased to allow more in-depth coverage. The analysis also revealed that the end-of-course comprehensive exam question distribution deviated from the distribution used by the NRC, especially in the components area. To prevent such deviation in the future, a desk top instruction providing guidance on the makeup of the comprehensive fundamentals exam, utilizing the question distribution as seen on the GFES exam, is being developed.

The improvements in Fundamentals training are scheduled to be completed prior to the start of the next Fundamentals class.

B. LICENSE OPERATOR TRAINING (LOT)

The QP&P and candidate interviews identified that information was presented too quickly. The LOT schedule has been adjusted to ensure a minimum of 2 hours per day for self study. Also identified was a lack of general understanding of the program schedule, the NRC exam schedule, and the NRC grading criteria. An introductory module is being developed to specifically address these three items. Study habit improvement methods and management's performance expectations will be included in this introductory module. The QP&P also revealed the candidates were not satisfied with the current sequencing of the systems module. They felt electrical distribution should be taught earlier in the sequence. The schedule for system training is being adjusted to teach electrical distribution earlier in the systems sequence.

An evaluation was performed of the January license written examination to determine areas of generic weaknesses. Procedures were identified as an area in which candidates exhibited a general deficiency. Specifically identified were administrative procedures, system operating instructions, and off normal event procedures subsequent actions. The sequencing of classroom procedure training and procedure usage in the simulator is being adjusted to provide immediate reinforcement of the classroom instruction through simulator performance.

The examination report stated that weaknesses were observed in the performance of job performance measures (JPM), emergency locker familiarization, and plant computer system operation. The on-the-job (OJT) training and the simulator segments of the program are being reviewed for incorporation of periodic JPMs, emergency locker inventory, and practical use exercises of the plant computer systems.

RESPONSE TO EXAMINATION REPORT NO. 50-416/92-300 (Continued)

Additionally, management recognized that current screening processes were ineffective in ensuring the competency of the candidates to meet performance standards. To improve the screening processes, a number of initiatives have been undertaken. The pass/fail criteria of an average of 80 percent for written exams is being changed to a minimum of 80 percent on each exam. Remedial training and retesting criteria for marginal and/or poor exam performance is being established to provide specific guidance and processes to accomplish the retraining. Periodic examinations are being improved through the addition of higher order cognitive type questions and through longer, more comprehensive exams. The Operations Training Evaluation Committee (OTEC) is being re-evaluated as to its purpose and function. The OTEC is returning to the practice of conducting oral boards for each candidate, concentrating on weaknesses identified by previous evaluations. Finally, an independent audit exam will be used to determine final candidate competency. All candidates will be required to pass this exam before being allowed to take the NRC license exams.

These improvements are scheduled to be completed prior to the start of the particular module affected.