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U.S. Nuclear Regulatory Commission
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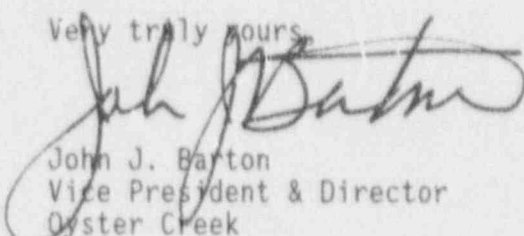
Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection Report 92-02
Response to Unresolved Items

The purpose of this letter is to respond to the unresolved items identified in Inspection Report 92-02 as requested by the letter transmitting the report dated February 25, 1992. Our response is attached.

If you should have any questions or require further information, please contact Brenda DeMerchant, OC Licensing Engineer at (609) 971-4642.

Very truly yours,



John J. Barton
Vice President & Director
Oyster Creek

JJB/BDEM:jc
cc: Administrator, Region I
Senior NRC Resident Inspector
Oyster Creek NRC Project Manager

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Attachment 1

Unresolved Item 92-02-01:

"There is a programmatic weakness in the implementation of the systems approach to training indicated by the failure to develop and implement a formal program for OJT for nonlicensed operators and the failure to develop and implement a formal EOP training for nonlicensed operators despite adequate job and task analysis information to support the development. These failures are Unresolved Item 50-219/92-02-01."

Response:

A formal continuing program description entitled "Oyster Creek Non-Licensed Operator On-The-Job Training (OJT) Program" has been developed and implemented. The purpose of this program is to ensure that non-licensed plant operating personnel possess the required job related knowledge and skills. OJT supplements non-licensed requalification training in order to broaden operator knowledge and enhance their abilities to perform assigned duties in a manner that promotes safe and reliable plant operations.

GPUN wishes to emphasize that an OJT effort has been a part of the non-licensed operator initial and continuing training programs since 1986, including qualification standards for adequate performance assessment of initial candidates. Formal documentation of the continuing training effort via a stand alone program description was only recently accomplished in February 1992.

Emergency operating procedure (EOP) training for the non-licensed operator (NLO) continuing training program has recently been enhanced. The upgrade of the NLO job task analysis identified specific EOP tasks for inclusion into the training program. These tasks have been included in the continuing OJT program and where appropriate in combined classroom lessons with the licensed operator program. Therefore, EOP training for NLOs using a systems approach to training has been developed and implemented.

Unresolved Item 92-02-02:

"The inspectors determined the programmatic approach the licensee has taken to develop, implement, and maintain high quality EOPs and support procedures is weak. This weakness is Unresolved Item 50-219/92-02-02."

Response:

Subsequent to the subject inspection, an EOP committee was formed with the full support of management, to oversee and coordinate the various requirements associated with the plant EOPs. This committee will be responsible for ensuring that the quality of the EOPs is maintained, both in a technical sense and from the aspect of operator usability.

The five primary groups represented include: Plant Engineering, Operations, Plant Training, Safety Analysis/Plant Control and Human Engineering. Some of the functions that this committee will be tasked with include:

- Technical review/approval of all proposed changes to the EOPs.
- Verification that all changes to the EOPs are in accordance with the BWROG Emergency Procedure Guidelines and the plant Writers Guide for EOPs.
- Validation of the EOPs and any changes to the EOPs, both on the simulator and by walkthroughs in the plant, to assure usability.
- Maintenance of the technical basis for the EOPs.

This committee has met twice and is planning to meet once or twice a month as needed. We are pleased and encouraged by the results of the meetings which demonstrate the advantages of a "team approach" to the problems and concerns generated by the EOPs. It is also expected that the groups represented will facilitate the transition of operator training on the procedures to our new simulator.

The following is our anticipated schedule for implementing our EOP support program.

- The EOP control document (Procedure 107.4) which will contain our validation and verification program, criteria on evaluating if plant modifications impact the EOPs, and a description of the EOP committee identified above is expected to be finalized by the end of November 1992.
- The flow chart writers guide is expected to be finalized by the end of the second quarter 1992.
- Validation of the EOP flowcharts and support procedures is expected to begin by the end of November 1992, and will continue after arrival of the simulator on site. The completion date of this process is dependent upon the date the simulator is ready for training.