



ENTERGY

Entergy Operations, Inc.
PO Box 756
Port Gibson, MS 39150
Tel 601 437 6408

W. T. Cottle
Vice President
Operations
Grand Gulf Nuclear Station

May 1, 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
Report No. 50-416/92-07
dated 4/3/92 (GNRI-92/00074)

GNRO-92/00050

Gentlemen:

Entergy Operations, Inc. hereby submits the response to Notice of Violation 50-416/92-007.

Subsequent to the issuance of Examination Report 50-416/92-300 which stated five of nine candidates failed to achieve the minimum requirement necessary to obtain an operating license, five candidates have submitted appeals to the NRC. Of the five appeals, three failures have been overturned and two are pending response. However, management understands the identified weaknesses in the license training program and is taking steps to resolve the concerns. Attachment III of this submittal addresses NRC concerns identified in the Examination Report.

Yours truly,

WTC/RR:cg
attachment

cc: (See Next Page)

040071

VIOL92-07 - 1
9205040313 920501
PDR ADOCK 05000416
V PDR

IE01
1/1

May 1, 1992
GNRO-92/00050
Page 2 of 3

cc: Mr. D. C. Hintz (w/a)
Mr. J. L. Mathis (w/a)
Mr. R. B. McGehee (w/a)
Mr. N. S. Reynolds (w/a)
Mr. H. L. Thomas (w/o)

Mr. Stewart D. Ebnetter (w/a)
Regional Administrator
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 2900
Atlanta, Georgia 30323

Mr. P. W. O'Connor, Project Manager (w/a)
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop 13H3
Washington, D.C. 20555

Notice of Violation 92-07-03

10 CFR 50, Appendix B, Criterion XVI (Corrective Action), and the licensee's accepted Quality Assurance Program (Administrative Procedure (AP) 01-S-03-1), GGNS Quality Program and AP-01-S-03-2, Quality Deficiency Reports) collectively require that condition adverse to quality be promptly identified and corrected, and that station personnel are responsible for taking appropriate corrective action whenever any deficiency in the implementation of the requirements of the program is determined.

Contrary to the above, corrective action implementation was inadequate in that corrective actions taken by the facility management to provide remedial training for one SRO candidate who had failed the NRC examination in July 1991, was performed inadequately prior to the NRC retesting in January 1992. The candidate was provided a list of identified weak areas and was instructed to self study in preparation for the in-house final examination and the NRC examination.

The training department administered a final in-house examination for 19 RO, SRO, SRO certification candidates on December 17, 1991. Of these 19 candidates, 14 failed the examination. The candidates were administered simulator and walkthrough examinations on the two following days and were retested on a second written examination on December 20, 1991, without remediation.

I. Admission or Denial of the Alleged Violation

Entergy Operations, Inc. admits to this violation.

II. The Reason for the Violation, if Admitted

In August, 1991, GGNS received notification of a SRO candidate's failure to pass the NRC license written examination administered in July, 1991. The decision to submit a second application to allow the candidate to take the January, 1992, examination was made, and a retraining program was developed based mainly on self study of weak areas identified from the failed NRC written examination. The program included comprehensive testing utilizing NRC style examination techniques. This type of retraining program has been used in the past and has been successful in remediating candidates for NRC examination weaknesses.

On December 17, 1991, a comprehensive NRC style written examination was administered to the January license class. As a result of the poor performance on the examination, a detailed review and analysis of the examination was performed. The conclusion indicated that the examination was more difficult than NRC examinations of the recent past.

Another comprehensive style written examination was generated, and the decision was made to retest the candidates on December 20, 1991. The decision to retest the candidates without intervening remediation was based on:

- Original examination was deemed more difficult than recent NRC examinations,
- Students had not been exposed to a comprehensive examination for approximately three months,
- Required completion of the training program prior to submittal of candidate applications for NRC license, and
- The desire to remove a major stress factor for the candidates during the holiday season.

III. Corrective Steps Which Have Been Taken and Results Achieved

A review of the License Operator Training Program procedure, 01-S-04-1, indicated that insufficient guidance is provided to ensure consistent practices and processes are utilized in the remediation of poor examination performance. A revision to this procedure has been initiated which will include:

- Criteria specifying when documented remedial training is required,
- Identification of responsibility for developing, approving, and tracking the completion of remedial training,
- Requirements for candidate counselling, and
- Acknowledgement of the requirements of his/her remedial training plan by the candidate.

A review of the License Operator Requalification Training procedure, 01-S-04-2, was performed to determine if a similar deficiency existed. The results indicate that sufficient guidance is provided in this program to prevent similar occurrences.

IV. Corrective Steps to be Taken to Preclude Further Violations

A review of the Non-License Operator Training Program procedure, 01-S-04-3, will be performed to determine if a similar deficiency exists.

Operations Training personnel will be trained on the additional guidance and procedural changes implementing the above requirements.

V. Date When Full Compliance Will Be Achieved

These actions will be completed by July 31, 1992.

Notice of Violation 92-07-04

Unit 1 Technical Specification, section 6.8.1, states in part that written procedures be established, implemented and maintained. AP-14-S-01-9, Revision 12, Instructor Training Qualification and Certification section 6.7.1., requires instructors to be evaluated and certified technically competent for their teaching assignments and the cognizant Training Supervisor/Superintendent or designated representative should evaluate the technical competence of the instructor. Section 1.1 states in part, "... This procedure applies to SERI instructors and to contract employees on extended assignment to the Training Section as Instructors." Section 7.1.1 states in part, "Instructors should be evaluated annually in terms of skills and knowledge and technical competency. The evaluation may consist of classroom, laboratory, or simulator demonstrated performance or other documentable means of assessment."

1. Contrary to Section 6.7.1, two contract instructors, who taught plant specific systems and/or transient response and analysis, were not evaluated and certified technically competent to teach the assigned lectures. One contract instructor taught the license class from February 11, 1991, until mid December 1991. The second contract instructor taught the license class from January 7, 1991, until mid December 1991. The contract instructors were not evaluated and certified technically competent by their training Supervisor/Superintendent or their designated representative.
2. Contrary to Section 6.7.2, the same contract instructors, taught the license class plant specific systems and/or transient response and analysis and were not evaluated in terms of instructional skills by the Immediate Supervisor/Superintendent, the Security and Instructional Training Supervisor or those supervisors' designated representative. One contract instructor taught from February 11, 1991, until the end of the course and the second contract instructor taught from the beginning of the course until mid December 1991. Neither contract instructor was evaluated for instructional skills during this period.

I. Admission or Denial of the Alleged Violation

Entergy Operations, Inc. admits to this violation.

II. The Reason for the Violation, if Admitted

Recognizing the need for contract instructors, Training initiated a search for available instructors through various suppliers. Specific criteria for the previous work experience and qualifications for the instructors were established. These criteria consisted of:

- previous SRO licensed or SRO certified individuals on a BWR-6, and
- previous classroom instruction experience.

As the individuals were identified, each was required to interview with Training management. The interview included a practice teaching session of at least 20 minutes on a technical subject. Based upon the interview, the practice teaching session, and previous instructor experience, selections were made for the contract positions.

The four selected contract instructors reported to GGNS to begin their assignment in January and February, 1991. As a result of student feedback and Operations' line management observation of classroom presentations, some instructional problems were noted. Resolution of these problems resulted in one instructor being removed from classroom instructional duties and was eventually replaced by the contract supplier. No additional problems were identified.

The cause for the stated violation was interpretation of procedure 14-S-01-9. Section 1.1 of 14-S-01-9 revision 12 states that this procedure applies to "... contract employees on extended assignment ... as instructors." The understood interpretation of "extended assignment" by Training personnel was greater than one year. Consequently, with the duration of the contract instructors' teaching assignments being less than one year, the technical certification of section 6.7.1 and the instructional skills evaluation of section 6.7.2 were not formally documented.

III. Corrective Steps Which Have Been Taken and Results Achieved

An extensive review of 14-S-01-9 revision 12 has been completed, and a revision to the procedure has been initiated. This revision includes:

- Deletion of the wording "extended assignment" in section 1.1 such that the procedure clearly states that all contract instructors must be certified in accordance with this procedure, except vendor developed and supplied courses.
- Deletion of section 7.0 concerning the periodic instructional skills and technical competence evaluations which are covered in procedure 14-S-01-9 revision 11, Instructor and Course Evaluations.
- Requirement that all new instructors be evaluated for their instructional skills during their first independent lecture.
- Requirement that all instructors complete Instructional Skills I training prior to being allowed to teach independently.

IV. Corrective Steps to be Taken to Preclude Further Violations

Training personnel will be trained on the new requirements established through the procedure revision.

V. Date When Full Compliance Will Be Achieved

These actions will be completed by June 30, 1992.

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

This Attachment contains information submitted to the NRC in the Licensing Examination Report Response, dated April 17, 1992. It is being submitted with the Response to Inspection Report 92-07 as requested by NRC staff.

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 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 (RCA) 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.

GENERIC FUNDAMENTALS EXAMINATION

Through candidate interviews and the QP&P, it was identified that the course scheduling required modification. Past 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.

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.

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 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 Systems 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.

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 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.