

April 5, 1985

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USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'85 APR -R P12:32

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of	)	
	)	
METROPOLITAN EDISON COMPANY	)	
	)	Docket No. 50-289 SP
	)	(Restart Remand on
(Three Mile Island Nuclear	)	Management - Training)
Station, Unit No. 1	)	

TMIA'S COMMENTS AND RESPONSE TO  
LICENSEE'S COMMENTS ON COMMISSION  
POLICY STATEMENT ON TRAINING AND  
QUALIFICATION OF NUCLEAR POWER PLANT PERSONNEL

On March 14, 1985, the NRC issued a "Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel," (Policy Statement). On March 20, 1985, the Atomic Safety and Licensing Board issued, "Memorandum Inviting Comments on Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel." On March 28, 1985, Licensee filed Comments in response to the Policy Statement. On March 28, 1985, the Board issued a Memorandum and Order in which it, on its own initiation, extended the time for parties other than Licensee, to file comments and responses to Licensee's comments, until April 5, 1985. This filing is in accordance with this April 5, 1985 order.

As discussed more fully below, the five criteria outlined in the Commission's Policy Statement at 3-4 and characterized by the

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NRC as being, "...elements essential to (an) acceptable training program," provide a helpful framework for evaluating the adequacy of a training program. However, the Board must retain responsibility for determining whether GPU's training program complies with those criteria. The Board must, "...independently evaluate ... Licensee's implementation of improvement programs to ensure that desired results are achieved." Policy Statement at 1. Indeed, the NRC can not relinquish responsibilities mandated to it by Congress to protect the public's health and safety.

With regard to this Licensee's training program, the Board has no alternative but to conclude, based on the record evidence, that the TMI training program does not meet the five criteria established in the Policy Statement. Licensee essentially admits its program does not comply with the fifth criteria and confuses it with criteria number four by narrowly construing the significance of criteria five.<sup>1</sup> Furthermore, at the close of the record, Licensee had not completed its job-task analysis and therefore was not in compliance with criteria one.

The Board has asked the parties to consider what effect the Policy Statement should have on their partial initial decision. The issue before the Board is the adequacy of Licensee's training program, and the five essential elements enumerated in the Policy Statement

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<sup>1/</sup> Criteria five addresses the evaluation of operators, 'in the job setting' as a measure of assessing the relationship of training to actual plant performance of operators. To the extent that GPU conducts this type of evaluation it is limited to operator response and performance during identified emergency conditions (simulator training and in-plant drills). This failing is especially ironic for this utility, whose inability to detect and correct routine problems led to the 1979 accident at TMI-2.

provide some helpful guidelines in this regard. However, there appears to be a fundamental flaw in the NRC's position that INPO accreditation will provide assurance of an acceptable training program. This flaw is most obvious when reviewing the evidence in this proceeding. The Policy Statement has set forth five elements which the Commission has decreed are essential to an acceptable training program. These five elements constitute minimum standards by which to judge a training program. These standards have not been met at TMI. Therefore, INPO's willingness to grant accreditation to the TMI training program despite the deficiencies of that program, demonstrates that the NRC's reliance on INPO's accreditation program is misplaced.<sup>2</sup>

The fifth criteria adopted by the Commission in its Policy Statement provides the ultimate test of the adequacy of the training program. Only by evaluating on-the-job performance can the NRC assess whether the training program has a realistic relationship to the performance of the operators and the plant. There can be no substitution for this real-world evaluation, and the Commission appears, by its ordering of the essential elements to recognize this fact.

This ultimate evaluation must be designed to measure the ability of operators to recognize and respond to seemingly insignificant initiating events which could lead to more serious events.

Licensee, in supplemental findings, argues that there is no

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<sup>2/</sup> In its comments, Licensee urges the Board to rely upon INPO's accreditation of the TMI training program as a basis for the Board's decision. None of the various INPO accreditation team reports are in evidence in this proceeding; they have not been subjected to the scrutiny of cross-examination. Despite Licensee's assertions to the contrary, it is the burden of Licensee to demonstrate that its training program is adequate.

need to evaluate operators as they perform seemingly routine day-to-day functions, and in its Comments on the Commission's Policy Statement, Licensee continues to deny the importance of evaluating routine performance; and claims that in spite of this shortcoming in its training program, criteria five has been met at TMI. This claim is based on two false premises.

First, Licensee confuses direct evaluation of the training program (criteria four) with evaluation of on-the-job performance. Secondly, Licensee claims that because operators are tested at the simulator and during in-plant drills, the fifth criteria is met. Licensee is flatly wrong in its interpretation of criteria five. The in-training testing referenced in Licensee's Comments at 6-8 evaluate only how well operators have assimilated their training. This type of evaluation does not test the ability of the training program to reflect actual conditions in the plant.

The simulator testing and in-plant drills test only the operators' ability to respond to identified emergencies. The operators' ability to recognize and respond to initiating events in an otherwise 'mundane' setting can only be tested by evaluation of the operators' day-to-day performance in the job setting. This is particularly critical at TMI with its long history of poor performance and training.

### Conclusion

The Board should utilize the criteria enumerated in the Policy Statement at 3-4 when measuring the adequacy of Licensee's training program. Based on those criteria, the Board must reach a conclusion that the TMI training program has not met the standard as an acceptable

program; and further, that INPO's accreditation in the face of these weaknesses is deficient.

Respectfully submitted,

*Louise Bradford.*

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Louise Bradford  
For Three Mile Island Alert, Inc.

April 5, 1985

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In the Matter of	)	
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METROPOLITAN EDISON COMPANY	)	Docket No. 50-289
	)	(Restart-Management Remand)
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Station, Unit No. 1)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "TMIA'S Comments and Response to Licensee's Comments on Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel" were served this 5th day of April, 1985, by service in the U. S. Mail to the attached service list.

*Louise Bradford*

Louise Bradford  
TMI Alert, Inc.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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