



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

Report No.: 50-416/84-47

Licensee: Mississippi Power and Light Company
Jackson, MS 39205

Docket No.: 50-416

License No.: NPF-29

Facility Name: Grand Gulf I

Inspection Conducted: November 5 - 9, 1984

Inspectors: <u>W. K. Poertner</u>	<u>12/18/84</u>
W. K. Poertner	Date Signed
<u>P. D. Wagner</u>	<u>12/18/84</u>
P. D. Wagner	Date Signed
Approved by: <u>C. Julian</u>	<u>12/18/84</u>
C. Julian, Section Chief	Date Signed
Operations Branch	
Division of Reactor Safety	

SUMMARY

Scope: This routine, unannounced inspection entailed 74 inspector-hours on site in the areas of General Employee Training, Shift Technical Advisor training and retraining, non-licensed personnel training, licensed operator requalification program, control room practices, and licensee action on previously identified inspection items.

Results: Of the five areas inspected, no violations or deviations were identified. One unresolved item was identified.

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REPORT DETAILS

1. Licensee Employees Contacted

- *R. F. Rogers, Manager, Plant Operations
- P. D. Ables, General Instructor
- *J. D. Bailey, Compliance Coordinator
- *K. E. Beatty, Training Superintendent
- J. E. Jones, Nuclear Instructor Supervisor
- *G. D. Lhamon, Operations Training Supervisor
- *J. W. Yelverton, Manager, Plant Support

Other licensee employees contacted included technicians, operators, mechanics and security force members.

NRC Resident Inspectors

- *J. L. Caldwell

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on November 9, 1984, with those persons indicated in paragraph 1 above. The following issues were discussed in detail: STA examinations during yearly requalification (paragraph 5.b); and an Unresolved Item (paragraph 5.b.). The licensee acknowledged the findings and took no exceptions.

3. Licensee Action on Previous Enforcement Matters

Not inspected.

4. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve violations or deviations. New unresolved items identified during this inspection are discussed in paragraph 5.b.

5. Training (41700)

a. General Employee Training (GET)

The licensee's General Employee Training (GET) program is established in Grand Gulf Administrative Procedure 01-S-04-4, Revision 9, dated October 17, 1984. This program is required for each full-time employee who must enter the secured area of the plant. The GET program covers quality assurance, general BWR steam cycle, security, industrial

safety, fire protection, site emergency plan, and radiation protection. Employees are required to pass an annual written exam with a minimum passing grade of 70 percent. Also, employees must attend the formal GET classroom presentation every other year. The classroom presentations are predominately presented through videotape lectures. The instructors, however, do some lecturing and answer questions as they arise.

The inspectors interviewed selected students who recently completed GET as well as those employees who have been through the general employee retraining program. The GET instructor was also interviewed. Selected training records were reviewed and a portion of the GET classroom presentation was observed.

The inspectors found the GET program to be in accordance with Administrative Procedure 01-S-04-4, applicable FSAR sections and ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel." The observed lecture was conducted in a professional manner and the students were attentive. The instructor informed students of recent changes to the licensee's organizational structure since the videotape did not contain this updated information. The instructor answered all questions proficiently. The GET student handouts were clearly written and accurate. The selected employee training records which were reviewed accurately reflected initial and requalification General Employee Training.

b. Shift Technical Advisor (STA) Training and Requalification

The Shift Technical Advisor (STA) program is established for selected plant engineering personnel to provide advanced technical assistance to the operating shift complement during normal and abnormal conditions. The STA training and requalification program is established in Grand Gulf Administrative Procedure 01-S-04-7, Revision 4, dated April 2, 1984.

The inspectors reviewed the training records of all qualified STAs, interviewed the Operations Training Supervisor and selected STAs, and reviewed procedures and commitments associated with STA qualification and requalification.

The results of the personnel interviews, records review, and procedures review show the initial STA training and requalification program to be adequate in providing a resource to the shift supervision and is conducted in accordance with the licensee's committed programs. Specifically, Administrative Procedure 01-S-04-7 reflects the licensee's commitments established in the Grand Gulf FSAR, Section 13.2.1.2.10, "Shift Technical Advisor Training Program", and 13.2.2.3, "STA Requalification Program". The licensee meets the intent of NUREG-0737, Item I.A.1.1, "Shift Technical Advisor" and Item II.B.4,

"Training For Mitigating Core Damage". The curriculum provided to STA candidates with respect to mitigating core damage exceeds the minimum requirements established in the letter from H. R. Denton, NRC, to "All Power Reactor Applicants and Licensees," dated March 28, 1980.

While reviewing Administrative Procedure 01-S-04-7, the inspectors noted that the time limits on the STA course material were eliminated and therefore appeared to deviate from the FSAR, Section 13.2.1.2.10, which specifies approximate times STA course material should last. Further investigation, however, revealed that the licensee conducted a safety evaluation on this subject in accordance with 10 CFR 50.59. The results of this safety evaluation were documented on Grand Gulf Safety and Environmental Evaluation Form and numbered SE 062/83. The licensee concluded that eliminating the time restrictions from STA administrative procedure did not impair the safe operation of the plant, nor did it impact the environment. A representative of the Plant Safety Review Committee (PSRC) signed the evaluation on November 9, 1983, indicating this group had reviewed the safety evaluation. This review is required in accordance with Technical Specification 6.5.1.6.6. The Safety Review committee (SRC) is also required to review safety evaluations in accordance with Technical Specification 6.5.2.7.a. The inspectors observed that no SRC signature was provided on the safety evaluation. The licensee contacted the SRC and requested documentation showing that the SRC had performed a review of the safety evaluation. The SRC, at the time of this inspection, was unable to produce this documentation. Until resolution, this item will be identified as an unresolved item (416/84-47-01).

The inspectors noted to the licensee that there are no requirements for STAs to be formally examined during the simulator or classroom phases of requalification. Concern was expressed by the inspectors regarding how the effectiveness of the requalification training could be determined without any required examinations. Also, without a formal examination process, little or no accurate feedback is available on instructor effectiveness. The Manager, Plant Support, indicated that the licensee would further evaluate this inspector concern.

c. Non-licensed Personnel Training

The licensee has committed to non-licensed personnel training in its FSAR, Section 13.2.1.2, "Training Programs for Non-licensed Personnel." The inspectors reviewed selected administrative procedures, interviewed selected supervisors and craftsmen, observed a portion of non-licensed personnel training, and reviewed selected training records. The inspectors found the non-licensed personnel training program to be in accordance with FSAR commitments, Technical Specification 6.4.1 and ANSI 18.1-1971.

The following Administrative Procedures were reviewed:

01-S-04-17, Revision 7, dated August 13, 1984, "Mechanical Maintenance Retraining and Replacement Training Program"

01-S-04-9, Revision 4, dated October 22, 1984, "Health Physics Training Program"

01-S-04-19, Revision 3, dated July 17, 1984, "Instrument and Control Section Retraining and Replacement Training Program"

The procedures reviewed adequately defined the licensee's training program. A system of formal classroom, on-the-job, and practical factor training is conducted among the various crafts required at Grand Gulf. Interviews conducted with the Electrical Maintenance and Mechanical Maintenance Supervisors clearly indicated strong management involvement in the training program of their personnel. The supervisors interviewed were cognizant of procedural training requirements.

The supervisors also developed effective tracking systems to insure their personnel received required training. The Health Physics supervisor briefed the inspectors with respect to the Health Physics formal training course which will begin early in 1985.

The inspector observed two training classes, a Mechanical Maintenance class which was performing Maintenance Procedure 07-S-14-308, "Reverse Indicator Alignment for Rotating Equipment," and a "Maintenance Procedures" class. The instructors were knowledgeable of the subject matter and emphasized the necessity for procedural compliance. The students appeared attentive.

A selected number of training records were reviewed. The training records were current, including appropriate entries for training in mitigating core damage, which is required by NUREG 0737, Item II.B.4.

6. Requalification Training (41701)

The inspectors reviewed the Licensee's Requalification Training Program for 1984 to determine conformance with the requirements of 10 CFR 55, the Grand Gulf Final Safety Analysis Report and Grand Gulf Administrative Procedure 01-S-04-2, "Licensed Operator Requalification Training". The 1984 requalification training has just been completed and the 1985 requalification training schedule is under development. The 1984 requalification program appears to exceed the requirements. The Operations Department is presently on a five shift schedule and every fifth week is devoted to training.

The inspectors reviewed the 1984 annual written exams administered to the licensed operators (SRO and RO). The exams were structured in the same format used by the NRC and the questions were similar in format and difficulty to the questions asked in NRC requalification exams. The inspectors identified one licensed individual that failed one section of the

annual written exam but received an overall grade of greater than 80%. The individual was removed from licensed duties and underwent accelerated requalification training in the deficient section. The accelerated requalification training consisted of four days of self study after which the individual was re-examined on the section he had failed. The inspectors reviewed both the original and make-up exams and noted no discrepancies.

The inspectors reviewed selected lesson plans and system descriptions used in the training of licensed operators. The inspectors noted that the system descriptions contained inaccuracies; however, the inaccuracies appeared to be addressed and corrected in the lectures. The inspector monitored a lecture provided to the RO candidates. The instructor was well prepared and responsive to the questions asked by the students. The students were attentive and motivated. A professional atmosphere conducive to learning was maintained by all throughout the lecture.

The inspectors reviewed the requalification records of selected SRO's and RO's for adequacy. The individuals selected appeared to have received the required training as set forth in the 1984 requalification program. The inspectors interviewed an SRO and RO to determine their impressions of the requalification training they had received, both individuals stated that the training was beneficial, informative and pertinent to the operation of the facility.

The inspectors reviewed the instructor qualifications and determined that only one instructor holds a license on the Grand Gulf facility; however, all instructors have previously held an SRO license or an Instructor certification on a BWR facility. The instructor training appeared to meet the requirements of administrative procedure 01-S-04-2.

In the Area of Requalification Training, no violations or deviations were observed.

7. Control Room Practices

The inspectors observed control room operations. The operators were cognizant of evolutions in progress and were knowledgeable of the causes for various alarm conditions. Control room access appeared to be adequately controlled and in keeping with NUREG-0737, Item I.C.4, "Control Room Access."

8. Inspector Followup Item (IFI)

(Closed) IFI (416/83-38-16): QAP 16.10, Revision 18, dated August 31, 1984, accurately reflects required action in the event a response continues outstanding through another week.