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April 26, 1992

Docket No. 50-461

Mr. H. J. Miller
Director-Division of Reactor Safety
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyr, Illinois 60137

PRIORITY ROUTING

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Subject: Response to Initial and Requalification Retake Examination (OL-92-01) Concerns

Dear Sir:

This letter provides the Illinois Power (IP) response to the Nuclear Regulatory Commission's (NRC) concerns regarding the Initial and Requalification Retake Examination (OL-92-01) administered during the weeks of January 20 and 27, 1992.

Three concerns were identified during the examination. These concerns involved the lack of quality assurance on the reference material submitted to the NRC prior to the examination, weakness of the facility pre-examination review, and the existence of IP procedural and lesson plan discrepancies. IP is taking corrective actions to address these concerns.

Attachment 1 to this letter provides the details of the corrective actions IP is taking in response to the identified concerns.

Sincerely yours,



F. A. Spangenberg, III
Manager, Licensing and Safety

MAR/alh
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Attachment

cc: NRC Clinton Licensing Project Manager
NRC Resident Office
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety

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IP Response to Initial and
Requalification Retake Examination Concerns

Concern #1

"Material presentation lacked quality assurance. We are concerned about the incomplete and duplicative reference material as well as the lack of attention to indexing and labeling of procedures and Lesson Plans provided to the NRC and contract examiners. The material did not meet the requirements detailed in the cover letter and Enclosure 1 of the initial examination 90 day notification letter of September 27, 1991. You should note that future problems with material presentation may result in cancellation of the associated examination (Section 4)."

IP Response

The Nuclear Training Department (NTD) has met with the NRC Region III Examiners to determine how the reference materials should be assembled to support the development of examinations. The recommendations identified in these meetings were compiled and are being incorporated into NTD procedure 2.17, "NTD Conduct of NRC License Examinations". A copy of this procedure has been provided to Mr. M. Beilby of NRC Region III staff. The reference materials for the initial retake examination which is scheduled for June, 1992 are being assembled as described in this procedure. Specific features of this procedure include:

- A. A table providing a cross-reference of the NRC-requested references to a general description of the references to be provided by IP is included in the procedure to ensure that all of the documents needed by the Chief Examiner are provided. The procedure requires that the training staff review the general description of the IP references with the examiner and amend it as required. The training staff will then amend the various detailed reference lists as appropriate.
- B. Detailed instructions for assembling the references will be provided to the NTD Document Control Staff. The instructions will specify the sequencing of individual documents, tabbing of each document, and the labeling of each binder.
- C. The following indexes will be provided to improve the examiner's ability to locate a specific reference.
 - 1) Numerical listing of all enclosed procedures with a noun name;
 - 2) Numerical listing of all enclosed lesson plans with a noun name;
 - 3) Alphabetical listing of all lesson plans;

- 4) Alphabetical listing of plant system acronyms cross-referenced to noun number, drawing number, and operating procedure number; and
- 5) A manifest of the contents of each box of references.

D. An audit of the contents of each binder will be performed to ensure that items are not duplicated or omitted after the reference materials are assembled.

Concern #2

"The facility preexamination review was weak, as evidenced by the large number of post-examination comments. A large number of discrepancies were not identified and resulted in significant changes to the examination grading and timeliness of examination evaluation (Section 4)."

IP Response

While meeting with the NRC examiner, the IP training staff was made aware of the various approaches that other utilities have used to conduct a pre-examination review. As a result of these discussions, it was concluded that the IP examination review team should consist of two to three people (the third person would be used as described in Day 3 below). On Day 1 of the preexamination review, the examination review team and an additional CPS Plant Staff Senior Reactor Operator (SRO) and Reactor Operator (RO) will take the proposed examination. The procedure revision addressed in Concern #1 reflects this and describes the following process:

- Day 1 - The examination team and a CPS Plant Staff SRO and RO should take the examination. The examination team would consist of a senior training staff member and a senior Plant Staff SRO. The examination team should debrief the SRO and RO (following the examination) to gather information needed for developing comments. The SRO and RO should be released after Day 1.
- Day 2 - The examination team should review each examination question and develop comments or replacement questions. The examination team should review the answer to each examination question and other applicable references pertaining to the subject matter of the questions to ensure that there is one and only one correct answer for the question.
- Day 3 - The completed comments should be reviewed to ensure that they are correct. A third independent examination team member may be used to support this review. The completed comments are presented to the NRC Examiner for consideration.

Concern #3

"Numerous procedural and lesson plan discrepancies were identified by examiners during examination preparation (Section 5)."

IP Response

The discrepancies identified in the reference materials have been carefully reviewed and appropriate corrective actions have been initiated. Actions taken in response to the specific discrepancies identified in Section 5 of the examination report are as follows:

- A. CPS Procedure 3302.01, "Reactor Recirculation," has been revised to make proper reference to the minimum shutdown range water level for natural circulation. This change makes the procedure consistent with other facility procedures.
- B. Lesson Plan 85205 has been revised to reflect the proper method for transferring the Residual Heat Removal (RHR) System from the Shutdown Cooling (SDC) mode to the Low Pressure Coolant Injection (LPCI) mode.

When the RHR System is in the SDC mode, the LPCI mode is inoperable and is not available. The Operating Procedure for RHR, CPS Procedure 3312.01, requires that the system be secured from the SDC mode and placed in a standby mode. Once in the standby mode, the system can then be safely placed into the LPCI without causing excessive "water hammer" and potential structural damage.

- C. Lesson plan 87552 has been revised to be consistent with the EOP Flow Chart, Detail A, "Reactor Pressure Vessel (RPV) Water Level Instruments."
- D. As demonstrated in Lesson Plan 87212, Learning Objective 1.1, the Nuclear Training Department (NTD) lesson plan objectives consistently require operators to be able to state precautions and limitations of plant procedures. The feedback process of the systems approach to training has identified this practice as a problem. Future revisions to NTD lesson plans will modify these objective this practice appropriately.
- E. The learning objectives as stated in the Instructor and Student Handbooks for Lesson Plan 85271 were not consistent. Lesson Plan 85271 has been revised to correct the inconsistencies.

Other IP Corrective Actions

- A. The timely delivery of materials is important to the overall examination quality. The procedure revision addressed in Concern #1 requires that reference materials be shipped by three-day United Parcel Service (UPS). This will allow more timely tracing of reference materials if they do not arrive as expected, thus, minimizing the delay that might occur with a lost shipment.
- B. Lesson Plan 85201, "Rod Drive," has been revised to ensure that operators understand how rod drive differential pressure is maintained as reactor pressure increases during startup. This was an identified knowledge weakness.
- C. Lesson Plan 87245, "Main Turbine," has been revised to stress the importance of monitoring turbine first stage pressure during shell warming. The lesson plan refers to "Cautions" contained in CPS Procedure 3105.01, "Turbine (TG, EHC, TS)" which provide values (setpoints) for the low power setpoint for the rod pattern controller and for arming the Reactor Protective System turbine trip. The lesson plan was revised to ensure that operators have a clear understanding of the setpoints contained in CPS Procedure 3105.01.
- D. The NRC Examiners noted that whenever a Bailey controller [such as the Reactor Core Isolation Cooling (RCIC) turbine speed controller] malfunction is inserted, it affects other Bailey controllers in the simulator. This problem was identified in October, 1991. The scope of the problem is limited to intermittent spikes in the indicated automatic control signals for Feedwater and RCIC flows. There is no apparent effect on the controlled processes. Correction of the problem requires major alterations to the affected models. As a part of the ongoing upgrade of the simulator modeling, these models are scheduled to be upgraded in the fourth quarter of 1992. In the interim, the impact on training is minimal.