



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

Report Nos.: 50-321/85-07 and 50-366/85-07

Licensee: Georgia Power Company
P. O. Box 4545
Atlanta, GA 30302

Docket Nos.: 50-321 and 50-366

License Nos.: DPR-57 and NPF-5

Facility Name: Hatch 1 and 2

Inspection Conducted: February 5-7, 1985

Inspectors:	<u>K. Poertner For</u>	<u>3/15/85</u>
	D. P. Falconer, Team Leader	Date Signed
	<u>K. Poertner</u>	<u>3/15/85</u>
	K. Poertner	Date Signed
	<u>K. Poertner For</u>	<u>3/15/85</u>
	K. E. Brockman	Date Signed
Approved by:	<u>C. Julian</u>	<u>3/15/85</u>
	C. Julian, Section Chief	Date Signed
	Operational Programs Section	
	Division of Reactor Safety	

SUMMARY

Scope: This special, announced inspection entailed 66 inspector-hours on site in the areas of the accelerated requalification program review and plant training program review.

Results: In the two areas inspected, three violations were identified:

Violation: Failure to implement NUREG 0737 requirements for items I.C.5 and II.B.4, paragraphs 7 and 8.

Violation: Submittal of application for license (NRC Form 398) containing inaccurate information, paragraph 11.

Violation: Failure to provide approved procedure controlling training record storage, paragraph 12.

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REPORT DETAILS

1. Licensee Employees Contacted

- *R. Zavadoski, Acting Deputy General Manager
- *J. Badgett, Manager, Nuclear Training - Corporate
- *L. Sumner, Manager of Operations
- *P. Fornel, QA Site Manager
- *B. Phillips, Supervisor, Plant Training
- *J. Nikitos, Supervisor, Regulatory Compliance
- *C. Stancil, Regulatory Compliance Engineer
- *R. Grantham, Supervisor, Operations Training
- *C. Moore, Manager, Nuclear Training - Hatch
- *T. Elton, Acting Supervisor, Regulatory Compliance

Other licensee employees contacted included operators, technicians, mechanics, and training staff personnel.

NRC Resident Inspector

- *P. Holmes-Ray, Senior Resident Inspector

- *Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on February 7, 1985, with those persons indicated in paragraph 1 above. The licensee acknowledged the inspection findings with no dissenting comments.

In a March 13, 1985, telephone discussion the inspector informed the Plant Manager that a Region II review of the report details presented in paragraph 12 below indicated that a violation (failure to provide approved procedure controlling training record storage) had occurred. This finding was identified as a Deviation at the exit interview on February 7, 1985.

The licensee did not identify as proprietary any of the material provided to or reviewed by the inspector during this inspection.

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 7.

5. General Employee Training (41700)

The inspectors reviewed the licensee's General Employee Training (GET) program to verify conformance with FSAR, Section 13.2.1.4 and ANSI N18.1-1971. Procedure HNP-203, General Employee Training, implements the licensee's GET program. The inspectors verified, through the review of selected personnel training records, that GET was being provided to the depth and frequency specified in HNP-203. Furthermore, the inspectors verified that prenatal radiation exposure requirements were being provided as part of GET.

Within the area of GET, no violations or deviations were identified.

6. Support Engineer Training (41700)

Presently, the licensee does not have a formal training program developed for support engineers. Some support engineers do attend the maintenance systems course on a limited basis; however, the level of instruction is only commensurate to that needed by a mechanic or technician. The licensee has begun the initial development of a support engineer training program. Implementation will be identified as an Inspector Followup Item (321, 366/85-07-01).

7. Mitigating Core Damage Training (41700)

The inspectors reviewed training records to verify that plant staff were receiving training in the mitigation of accidents in which the core is severely damaged pursuant to NUREG 0737, Item II.B.4. This training is provided to all licensed operators and Shift Technical Advisors (STAs) as part of the operator requalification program. Training for Health Physics and Chemistry managers and technicians is provided during radiological emergency team training, given as preparation for the annual emergency drill.

In the licensee's May 6, 1982, response to the NRC concerning questions regarding NUREG-0737, Item II.B.4, the licensee stated that "Training for I&C technicians, as necessary to assist in core damage conditions, is accomplished through their routine on-the-job training as part of their routine duties." The inspectors do not consider the on-the-job training provided I&C technicians to be sufficient to meet the intent of NUREG-0737, item II.B.4. In that the NRC previously accepted the licensee's program for training I&C technicians in mitigating core damage, this item will remain unresolved pending establishment of an adequate program (321, 366/85-07-02).

NUREG 0737, item II.B.4 requires that mitigating core damage training be provided to the plant manager. The licensee's response to NUREG 0737, item II.B.4 states that while "certain individuals may not have received training due to their recent assignment to their positions, it would be provided during upcoming retraining."

The Nuclear Regulatory Commission Order dated July 10, 1981, required that the licensee implement the requirements of NUREG 0737.

Contrary to the above, the current plant manager has not received training in mitigating core damage commensurate with the licensee's May 6, 1982 submittal. This is a violation (321, 366/85-07-03).

8. Feedback of Operating Experience to Plant Staff (41700)

The inspectors reviewed the licensee's method for providing operational experience feedback to plant staff to verify that the requirements of NUREG-0737 Item I.C.5 were being met.

Feedback of operating experience is controlled by procedure HNP-911, Operating Experience Assessment Report. HNP-911 provides for the assessment of LERs, Notepad, INPO reports, NRC Bulletins, procedure changes, design modifications, etc., by STAs, and the compilation and distribution of relevant information to all licensed personnel and training instructors as required reading.

Although HNP-911 adequately provides feedback information to operators and training personnel for incorporation into training and retraining programs, NUREG 0737 Item I.C.5, further requires that this type of information be provided to other personnel such as maintenance and health physics technicians.

The licensee's submittal dated December 15, 1980, responding to NUREG 0737 Item I.C.5 states that "all operating personnel" receive feedback of operating experience and that provisions exist to assure that appropriate personnel are informed, and documents and training programs upgraded.

Contrary to the above, maintenance personnel are not addressed in HNP-911 and, therefore, do not receive operating experience feedback as required. This item is a second example of the licensee's failure to fully implement the requirements of NUREG 0737 cited as violation (321, 366/85-07-03) above.

9. Shift Technical Advisor Training (41700)

The inspectors reviewed the training records of eight Hatch Shift Technical Advisors (STAs) to verify that STA training and retraining were being conducted in accordance with regulatory requirements and licensee commitments. Each qualified STA has successfully participated in the licensee's initial training program including lectures, simulator and on-the-job training. Continued retraining has been maintained by participation in licensed operator requalification or senior reactor operator license training. The inspectors verified that failure to successfully achieve examination pass criteria in STA retraining resulted in removal from STA duties until required remedial training was completed.

Review of the licensee's STA training program identified the following concern. The STA training program was developed and submitted to the NRC by letter dated March 9, 1982, pursuant to NUREG 0737 Item 1.A.1.1. The licensee's submittal, which was a program description, constitutes the only administrative instructions controlling the STA training program. Although not specifically required by NUREG 0737, Item 1.A.1.1, the inspectors consider detailed administrative instructions implementing the STA training program necessary to ensure conformity and continued compliance with regulatory requirements and licensee commitments. Development of administrative procedures controlling the implementation of the STA program, as submitted pursuant to NUREG 0737, Item 1.A.1.1, will be identified as Inspector Followup Item (321, 366/85-07-04).

Within the area of STA training, no violations or deviations were identified.

10. Maintenance Training (41700)

The inspector interviewed several maintenance personnel and maintenance training instructors to verify that training and retraining were being provided as required. Maintenance training materials, instructional aids and laboratory facilities were reviewed to determine adequacy.

The inspector considered the licensee's instructional aids and laboratory facilities for training in the areas of electrical, mechanical and I&C maintenance to be exemplary. Commendable recognition was given to the extensive facilities provided for pump and valve maintenance training. In addition, interviews revealed that plant systems training provided an excellent supplement to the specialized maintenance training curriculum. The following concerns were noted by the inspectors:

- a. A formalized on-the-job training program has not been implemented for maintenance personnel. This concern should be resolved upon development of performance-based training methodology to meet INPO accreditation standards. Development and implementation of formalized OJT will be an Inspector Followup Item (321, 366/85-07-05).
- b. During major outages, the licensee relies on a large number of contract maintenance personnel to supplement the permanent maintenance staff. Historically, the ratio of contract maintenance personnel to plant maintenance personnel can reach ratios approaching 2:1, depending on the department and the outage requirements. As a result, during peak maintenance periods, the majority of plant maintenance is undertaken by contract personnel with little or no site-specific maintenance training. It is imperative that the licensee maintain adequate supervision of these personnel to preclude errors due to their lack of site specific maintenance training. In that this deficiency is generic, followup will be pursued through generic channels.

11. Review of License Applications (41700)

The inspectors conducted a review of submitted applications for initial and renewal of operator licenses to verify completeness and accuracy of required disclosure information.

During reviews of senior reactor operator license applications for two plant STAs, the inspectors identified the following discrepancies:

- a. An application contained the statement that the applicant had previously taken the NRC examination in July 1984, when in fact, the applicant was withdrawn from the July 1984 examination, and subsequently wrote for the September 1984 examination.
- b. An application contained the statement that between September 1981 and December 1981, the applicant had participated in STA training, including four weeks of simulator training. In fact, simulator instruction was not provided until May 10, 1982, and consisted of 14 days of instruction. In this case, the actual simulator instruction provided met all regulatory requirements.

10 CFR 55.10(d) requires that each application shall contain complete and accurate disclosure as to all matters and things required to be disclosed. Contrary to the above, the licensee did not provide accurate disclosure as detailed in items a and b of this paragraph.

This is a violation (321, 366/85-07-06).

12. Requalification Training Program (41701)

The licensed operator requalification training program is governed by E. I. Hatch procedure HNP-200. The inspector reviewed the requalification training program for 1983 and 1984 to determine conformance with the requirements of 10 CFR 55, the Hatch Final Safety Analysis Report and E. I. Hatch procedure HNP-200. The inspector reviewed the following areas: retraining conducted in 1983 and 1984; annual written examinations; documentation of required control manipulations; schedule for conducting lectures; feedback of operating experience; and participation in an accelerated requalification program, when applicable. The training records of selected SROs and ROs were reviewed.

The inspector reviewed the schedule of lectures and the attendance sheets for 1983 and 1984. It was not possible to reconstruct the training provided to licensed operators from the records retained in the training department. The inspector could only determine that training had been provided and infer from the examinations what had been covered in the training. The attendance sheets only contained the individual's name and how many hours of training he had attended. No record of the material covered was contained in the

attendance records. The inspector identified numerous individuals that had not attended all of the requalification training sessions in 1983. The Hatch FSAR and HNP-200 allows licensed individuals that score greater than 80% on any section of the annual written examination to be exempted from required attendance at requalification lectures pertaining to that section. The inspector was unable to determine if these individuals had or had not attended all required lectures. No documentation was contained in their training folders justifying exemption from requalification training; therefore, the inspector was unable to verify successful completion of requalification training.

10 CFR 50, Appendix B, as implemented by the licensee's accepted QA program requires that approved procedures be developed and implemented for the control and retention of quality records. Contrary to these requirements, training records are not maintained in accordance with an approved procedure. No procedure exists to define the required contents, retention and control methodology. This is a violation (321, 366/85-07-07).

The inspector reviewed the qualification of selected instructors teaching licensed operators. All Georgia Power instructors are either licensed or hold an NRC instructor certification. They are actively involved in a requalification program. Most of the requalification training, however, is being conducted by General Physics instructors. These instructors are not actively engaged in the Hatch requalification program, other than being involved in the required reading program to keep current on plant changes. While General Physics requires annual requalification verification via an annual examination, this practice is seen as being only minimally acceptable.

13. Accelerated Requalification Training Review

Review of the Accelerated Requalification training program was conducted as part of the followup actions identified in Inspection Reports 50-321/OL-84-01 and 50-321, 366/84-51. The inspection consisted of an in-office review of training materials and on-site interviews, observation, and records review.

a. Interviews with utility employees yielded the following information:

- (1) All personnel interviewed confirmed that the original requalification program provided neither the quantity, nor consistency of training necessary to maintain the knowledge and skills required of a licensed operator.
- (2) The quality of training provided in the accelerated requalification training program has been very good. The material covered has been appropriate, in that, it has addressed areas of weakness. There was a general concern, however, that the studies in the thermal sciences were presented at a pace too rapid for retention.

- b. Numerous areas for improvement were identified during the December 17-18, 1984 inspection. The following improvements were noted:
- (1) Utilization of normal and abnormal operating procedures during simulator scenarios was improved. Shift Supervisors were encouraged by instructors to refer to and utilize procedures as a means to ensure cognizance of, and control over the activities of the operations team. Emphasis in this area should continue.
 - (2) Emphasis on establishing clear and precise communications has been initiated. Management directives on communications in the control room, supported by training emphasis in the simulator environment, should improve this identified weakness.
 - (3) The quality of weekly examinations has been upgraded. Current examinations are oriented to questions requiring a greater integration of knowledge, as opposed to factual recall. Many questions from previous NRC prepared examinations were identified. Emphasis should be placed on the development of unique questions comparable to the depth these questions.
- c. The following items were confirmed and acknowledged by the utility as being open items and subject to future NRC review:
- (1) Evaluation of the success of the Accelerated Requalification Training Program will be based upon NRC administered examinations to be conducted during the weeks of March 11-15, 1985, and July 15-19, 1985. Details of the examinations can be found in Inspection Report No. 50-321, 366/84-51, paragraph 4.d. Program success will be determined after the July exams (Inspector Followup Item 321, 366/85-07-08).
 - (2) Based upon the determination by the NRC that the Hatch Requalification Program was unsatisfactory (50-321/OL-84-01), Hatch must reestablish an NRC approved requalification program. Georgia Power must therefore submit, for approval, the requalification program which will be initiated after completion of accelerated requalification training in July 1985. Approval of this program will be required by October 15, 1985, and will be tracked as Inspector Followup Item (321, 366/85-07-9).