



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA STREET, N.W.
 ATLANTA, GEORGIA 30303

U.S. NRC

APR 02 1984

1984 APR -3 PM 4:03

MEMORANDUM FOR: Robert H. Burch, Investigator, Office of Investigations
 THRU: *R* R. C. Lewis, Director, Division of Project Evaluation Resident
 Programs (DPRP)
 FROM: D. M. Verrelli, Chief, Project Branch 1, DPRP
 SUBJECT: "CASE NO. RII 84A 0023"

Your memorandum dated February 24, 1984, summarized concerns expressed by a Confidential Source (CS) that the statements contained in MP&L letter AECM-84/0100 dated February 11, 1984 are deceptive. The concerns expressed in your memorandum are focused on training of mechanical maintenance personnel, whereas the MP&L letter focuses on licensee actions and programs to satisfy NRC requirements and FSAR commitments for non-licensed personnel. There is a distinct difference between these and licensee procedures which are over and above regulatory requirements. As I best recall from your initial briefing, the concerns by the CS were more along the lines of competence of certain mechanical maintenance supervisors, inadequate records and falsified data.

I. REGULATORY REQUIREMENTS ISSUES

- (1) The CS stated that Mechanical Maintenance personnel have not received "Fire protection and fire fighting organization training."

A regional-based inspector conducted a review of the Grand Gulf fire protection program in mid-1983. The results are documented in Inspection Report No. 83-26.

As stated therein, the licensee's fire brigade is constituted only of operations personnel. Organization and training have been adequately accomplished. Regional-based inspectors have also reviewed the portions of the licensee's Emergency Plan as related to fire protection. As indicated therein, there is no licensee commitment for fire protection training of maintenance personnel. Nevertheless, a recent inspection was conducted by the Senior Resident Inspector during an emergency drill at Grand Gulf. The inspection included a review of licensee internal procedures and training records for Mechanical Maintenance. Our finding is that the licensee violated his procedure for fire protection training and a Notice of Violation will be issued (IR 84-07). Licensee management has been asked to address apparent discrepancies in training records.

- (2) The CS took exception to the statement that "specialized training for maintenance... personnel" is being conducted.

During the period January 17-20, 1984, a regional based inspector conducted an assessment of non-licensed personnel training at the Grand Gulf facility. The results are documented in Inspection Report 50-416/84-02.

APR 02 1984

Robert H. Burch

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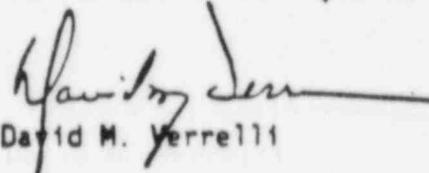
As a follow-up to this effort, a regional-based supervisor reviewed, during the week of February 20, 1984, maintenance and training department records of vendor schools' training. The findings support a conclusion that FSAR commitments have been met. Specialized vendor training has been provided in the areas of Diesel Generator sets; control rod drives and instrumentation.

In this regard, at the meeting of January 30, 1984, Region II management asked the licensee what assurance we have that when maintenance is being performed which requires specialized training, that at least one of the individuals on the crew had received it. The licensee stated that this was a line responsibility, and that no policy statement had been issued. We related to the licensee that this was not adequate. Accordingly, subsequent to the meeting, MP&L issued the two Grand Gulf memoranda attached to your memorandum. Thus we do not find the licensee's actions to imply that they were in place at the time of the meeting.

Further, in regard to "sufficient" numbers of personnel who have completed the various training programs, this is a judgment and is not inspectable.

II. ADEQUACY OF CONTROLS OF MAINTENANCE ACTIVITIES

We continue to be concerned over the adequacy of maintenance supervision and staff at the Grand Gulf facility. This was a functional area rated as a Category 3 during the last SALP evaluation. This area will be reviewed during another Operational Readiness Inspection to be completed during the first week in April 1984. We will advise you of our findings.


David M. Verrelli

cc: C. A. Julian

RESULTS OF INTERVIEW WITH EDDIE LEE HENNINGTON ON
MARCH 26, 1984 AS PREPARED BY ROBERT H. BURCH

On March 26, 1984, Eddie Lee HENNINGTON was interviewed at his residence by Investigator Robert H. Burch. HENNINGTON, who resides at [redacted] advised he has been employed at the Mississippi Power and Light Company's (MP&L) Grand Gulf Nuclear Plant (GG) as a Mechanical Maintenance Supervisor since March 1981. He advised that prior to working at GG he was employed in a similar position for five years at Virginia Electric and Power Company's Surry Nuclear Power Plant. He said he is retired from the U.S. Navy where he served in the nuclear surface program.

HENNINGTON advised that when he first came to the MP&L/GG facility in March 1981 there was no plant administrative procedure for the Mechanical Maintenance Non-Licensed Training program. He said that the GG plant did not actually belong to MP&L at that time since Bechtel had not completed the start up program. He said the start up engineers were employees of Bechtel, General Electric, other contractors and MP&L, although Bechtel was responsible for all of the start up activities. HENNINGTON advised that by January 1982, when Administrative Procedure 01-S-04-17, Revision 0, Mechanical Maintenance Training Program was issued, most of the GG systems had been turned over to MP&L. He said the MP&L/GG Training Department was given the responsibility for implementing the Mechanical Maintenance Non-License Training Program. He said that MP&L employee Jim JONES was the individual responsible for ensuring that the Practical Factor (PF) Sheets, an attachment to the Administrative Procedure, were distributed to the mechanics for completion.

HENNINGTON advised that he first saw the PF sheets in early 1982. He described the PF document as a listing of approximately 40 tasks that each mechanic is required to perform as a part of their work assignments. He said this is considered on-the-job training for mechanic personnel. HENNINGTON said he did not see the Administrative Procedure which implements the PF sheets for a considerable time after he first saw the PF sheets. He stated that PF sheets listing the 40 tasks were given to him in early 1982 for each of the six to eight mechanics in his crew by the Assistant Maintenance Superintendent Billy BOOTS. He said BOOTS gave absolutely no instructions regarding the completion of the PF sheets and no time limit was placed on the completion of these documents. He said the only comment that he recalled from BOOTS was that the signatures and dates to be placed on the PF sheets by supervisors should be spread over a period of time. He said BOOTS did not elaborate on this remark. HENNINGTON advised that BOOTS gave no further instructions regarding completion of the PF sheets. He said that, in his opinion, BOOTS did not suggest falsifying the PF sheets or completing them "just for the sake of filling in blanks." He stated that neither BOOTS nor Maintenance Superintendent D. O. STAER, made any remarks regarding the completion of the PF sheets which he interpreted as improper or illegal. HENNINGTON stated that, in his opinion, the mechanical maintenance supervisors had to use their own imaginations as to how they were to complete the PF sheets for their mechanics since upper maintenance management did not provide any instructions or directions regarding completion of this document.

HENNINGTON advised that since he was not given instructions regarding the completion of the PF sheets, he and fellow supervisor Bill BRADLEY discussed alternative methods for performing this requirement. He said that he and BRADLEY mutually agreed to allow mechanics in their crews to identify the first date they had performed the tasks listed on the PF sheets. He said he told BOOTS that he intended to complete the PF sheets in this fashion. He said BOOTS responded that he did not care how the PF sheets were completed as long as supervisors felt comfortable that the mechanics could perform the listed tasks. He said BOOTS also told him that every journeyman mechanic should be able to perform all of the tasks listed on the PF sheets. HENNINGTON advised that with this limited guidance from BOOTS and not having seen the Administrative Procedure at the time, he distributed the PF sheets to all mechanics in his crew. He said he told each mechanics to review all of the tasks on the PF sheets and to indicate the date each had performed the listed tasks or one similar to it. HENNINGTON advised that he did not begin work on the PF sheets immediately and estimated that there was a delay of from six months to a year before he seriously began to complete the PF sheets for his crew members. He stated that when he collected the PF sheets from his crew members after they had indicated the dates on which they had performed listed tasks he began to satisfy himself that each mechanic could perform the listed tasks. He said he satisfied himself by discussing the tasks separately with each mechanic and required them to verbally explain the manner in which they had performed the tasks. HENNINGTON advised that he did not personally witness the performance of each and every task listed on the PF sheets by his mechanics but he satisfied himself that they knew how to perform these tasks through their verbal explanation of each process. He advised that he required each of his mechanics to explain the method of performing the task and the type of equipment used in the process.

HENNINGTON advised that not all of his crew members had performed all of the tasks listed on the PF sheets, however, some members of his crew had performed most all of the tasks listed. He stated he always assigned an inexperienced crew member with an experienced crew member and therefore trained his personnel in this manner to perform the tasks listed on the PF sheets. HENNINGTON advised that because some PF sheet tasks are performed more frequently than others, only about two or three mechanics actually completed all of the listed tasks. He advised that since January 1982 approximately 20 different mechanics have been assigned to his crew and he said he signed and dated some tasks on all of these PF sheets. He explained that he personally witnessed the performance of some of the tasks and he required individual mechanics to verbally explain the accomplishments of some tasks before he signed and dated the PF sheets. He reiterated that he was satisfied that each mechanic could perform the listed tasks before he signed and dated the PF sheets.

HENNINGTON advised that when the PF sheets were first distributed to the mechanics in January 1982 he was not aware that a "walk through" was required to verify that each mechanics could perform the listed task. He said that superintendents STAER and BOOTS were apparently not aware of this requirement either since they did not instruct the first line supervisors to conduct the verifications in this manner. He advised that because he and BRADLEY had initially agreed, and BOOTS concurred, that mechanics would indicate the date on which they had first performed a task listed on the PF

sheets, some of the dates they listed were dates prior to their coming to work at the MP&L/GG facility. HENNINGTON advised that as many as one third of the dates initially indicated by the mechanics are dates prior to their employment at the GG facility. He said this situation was first realized in about February 1984 and Superintendent BOOTS instructed all mechanical maintenance supervisors to correct these PF sheet dates and to have them coincide with the period of time during which each mechanic had been employed by the GG facility. HENNINGTON advised that in February 1984 he corrected some PF sheet dates for mechanics currently assigned to his crew. He stated that although he did not personally witness all of these tasks, he required each mechanics to again verbally explain the manner in which each was performed. He reiterated that he was satisfied all mechanics were able to satisfactorily perform all PF sheet tasks which he signed and dated. HENNINGTON further advised that the mechanics assigned to his crew had, at one time or another since their employment at the GG facility, performed most of the tasks listed on the PF sheets. He stated that the dates he placed on the PF sheets are dates on which he interviewed the mechanics and had them verbally explain the performance of the tasks listed on the PF sheets.

HENNINGTON reiterated that he at no time falsified the PF sheets by signing and dating the tasks listed thereon. He stated that when he signed a PF sheet task for his crew members he was totally and completely satisfied that they could perform the listed task.

HENNINGTON advised that at no time did superintendents BOOTS or STAER direct or instruct him to falsify or improperly complete the PF sheets. He stated he would not have done so even if told to complete them in an illegal manner. He said he did not realize or understand the requirements of the Administrative Procedure regarding the completion of the PF sheets until approximately February 1984, at which time he began to correct the mistakes he had made. HENNINGTON advised that as of the time of his interview he had witnessed approximately 98 percent of all tasks listed on the PF sheets for each mechanic in his crew. He explained that the only tasks he has not witnessed relate to fork lift training and he said this is accomplished in a specialized school of instruction for operators.

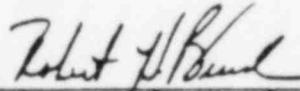
HENNINGTON identified communications problems between maintenance supervisors and superintendents as a primary cause of the PF sheets issue. He explained that superintendents rarely, if ever, give adequate directions and instructions to supervisors and the supervisors are expected to be knowledgeable of maintenance activities in spite of the failure of superintendents to keep them apprised of activities. He said maintenance efficiency and morale would improve markedly if superintendents would spend time with supervisors and listen to their complaints and concerns.

HENNINGTON advised that he is also dissatisfied with the current tagging procedures to isolate a particular valve or components. He stated he has expressed this concern to his supervisors who have shown no interest in changing the present procedures. HENNINGTON explained that the current procedure allows the maintenance employee to tag a component needing maintenance rather than making the control room supervisor responsible for this activity. He said the control room personnel are better acquainted with all of the systems and components than are the maintenance personnel

and therefore are in a better position to isolate and/or deactivate a particular component that needs repairs. HENNINGTON advised that the maintenance department is not on the distribution list for updated prints and therefore maintenance personnel frequently find themselves working with prints which are out of date or having to locate a current print before performing a particular maintenance function.

HENNINGTON concluded that he is not aware that any maintenance supervisor has falsified PF sheets and further advised he never discussed completion of the PF sheets with any person except Bill BRADLEY. He reiterated that at no time did Billy BOOTS, D. O. STAER or any other Maintenance Superintendent direct or instruct him to falsify PF sheets or deliberately sign and date these documents without first satisfying himself that the mechanics were able to perform all tasks listed in a satisfactory and safe manner. HENNINGTON declined to provide a sworn statement, citing personal reasons as the basis for his declination.

END OF RESULTS OF INTERVIEW WITH EDDIE LEE HENNINGTON ON MARCH 26, 1984.


Robert H. Burch, Investigator

RESULTS OF INTERVIEW WITH CHARLES RANDY HUTCHINSON
ON APRIL 12, 1984 AS PREPARED BY ROBERT H. BURCH

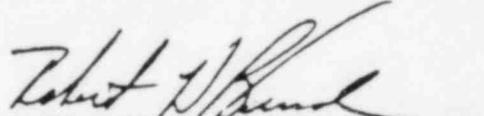
Charles Randy HUTCHINSON was interviewed in his office at Mississippi Power and Light Company's (MP&L) Grand Gulf Nuclear Station (GG) on April 12, 1984 by Investigator Robert H. Burch. HUTCHINSON advised that he has been employed with MP&L on the GG project since July 1973. He said he has served in his present job as an Assistant Plant Manager since October 1983. He advised that as an Assistant Plant Manager he is responsible for the Plant Maintenance Division at the GG facility.

HUTCHINSON advised that after the recent operator training deficiencies at the facility, which were investigated by the U.S. Nuclear Regulatory Commission, the President of MP&L, Mr. Jack RICHARD requested that GG plant officials conduct a review of non-license training in accordance with the FSAR commitments. He said this study was conducted by him and other GG officials and found that, although the FSAR commits MP&L to the training of employees assigned in the mechanical, electrical and instrumentation and control disciplines, it does not require Practical Factor (PF) sheets or Qualification Cards for maintenance personnel. He stated that he reviewed the requirements of the MP&L/GG procedure entitled Mechanical Maintenance Training Program, 01-S-04-17, in March 1984 after the Senior Resident Inspector (SRI) for the NRC advised at a March 9, 1984 exit conference that an unresolved item would be issued regarding the mechanical Practical Factors sheets. He said the SRI indicated he was citing the GG facility for violating its own procedure pertaining to PF sheets. HUTCHINSON stated that the GG Plant Manager then directed him to make inquiries regarding this matter and to determine the manner in which this plant procedure requirement had been implemented at the facility. He stated that the findings of the SRI reflected that one mechanical maintenance mechanic had a date entered on his PF sheet which was prior to the time the mechanic was actually employed by the MP&L/GG facility and said it was his (HUTCHINSON's) understanding that the Plant Manager desired him to determine the reason this incident had occurred.

HUTCHINSON advised that he conducted a very limited inquiry as directed by Plant Manager CROSS and found that Maintenance Mechanics BRADLEY and HANDLEY had been credited with completing a PF task prior to the time they had been employed by MP&L/GG. He stated he reviewed the circumstances of these two instances and determined they were given credit for the PF tasks because of prior experiences in these tasks at previous employment locations. HUTCHINSON advised that these two individuals told him they understood prior employment experience was acceptable in completing the Mechanical Maintenance PF sheets. HUTCHINSON further advised that he determined Mechanical Maintenance Mechanics were not familiar with the contents of the plant procedure entitled Mechanical Maintenance Retraining and Replacement Training Program. He said he also determined that Mechanical Maintenance mechanics and supervisors had violated this procedure by improperly certifying completion of the tasks listed on the PF sheets. HUTCHINSON advised that his limited inquiry further disclosed no evidence of a deliberate, willful violation of the plant procedure and that unfamiliarity with the procedure had caused the PF sheets tasks to be

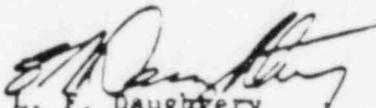
certified improperly. HUTCHINSON stated that mismanagement and substandard supervisory controls at the first and second levels of supervision in the mechanical maintenance department had also played a major role in the PF sheet certification problems. He stated that the PF sheet problems indicated a lack of attention to details by these levels of management and a lack of their involvement in the enforcement of the plant procedure. HUTCHINSON concluded that he did not probe into personality differences between mechanics and supervisors but said some mechanics and first line supervisors have either terminated with MP&L/GG or have been transferred to other divisions within the company because of apparent personality conflicts with Mechanical Maintenance Superintendent Dennis STAER.

END OF RESULTS OF INTERVIEW WITH CHARLES RANDY HUTCHINSON ON APRIL 12, 1984


Robert H. Burch, Investigator

MEMO TO: J. E. Cross
FROM: L. F. Daughtery
SUBJECT: NRC Exit Meeting Minutes 50-416/84-07
IPC: 84/2008

Attached is a copy of NRC Exit Meeting Minutes 50-416/84-07.


L. F. Daughtery
3/12/84

JDB/LFD/jlc

cc: R. F. Rogers
J. W. Yelverton
~~_____~~
D. L. Hunt
Plant File
NRC File 84-07

NRC EXIT MINUTES 50-416/84-07

Report Number: 50-416/84-07
Date: March 9, 1984
Date of Inspection: February 16 - March 9, 1984
Location: Plant Manager's Office

<u>Attendees</u>	<u>Titles</u>	<u>Organization</u>
A. G. Wagner	Senior Resident Inspector	USNRC
R. F. Rogers	Asst. Plant Mgr. - Ops	MP&L
J. W. Yelverton	Asst. Plant Mgr. - Support	MP&L
C. R. Hutchinson	Asst. Plant Mgr. - Maint.	MP&L
L. F. Daughtery	Compliance Superintendent	MP&L
D. L. Hunt	Training Superintendent	MP&L
J. E. Jones	Mechanical Training Supv.	MP&L

Areas Inspected

During the dates above, the inspector inspected the following areas: maintenance; surveillance testing; reportable occurrences; Technical Specification reviews; NRC open items; MP&L's Emergency Plan Drill exercise; and PSRC activities.

Results

Two (2) Notices of Violation will be issued and one (1) Unresolved Item.

Comments Made at Exit

The resident inspector informed MP&L that Plant Administrative Procedure 01-S-04-21 para 6.5.1 required that certain Emergency Preparedness Specialized Training be complete prior to one acting as an Emergency Response Team Member. He further informed MP&L, contrary to his review of qualification records of two maintenance personnel which were used as Response Team members during the March 8, 1984 exercise, he found that one member's training had expired and one member had never had any EPST. This will be cited as a violation for failure to comply with 01-S-04-21.

The inspector stated that MP&L's Quality Assurance Manual Policy 5 requires that activities affecting the safe operation of GGNS be prescribed and accomplished in accordance with documented instructions and procedures. However, per his review, he could not find any MP&L procedure dealing with the temporary assignments of personnel as stated in ANSI 18.1 para 3.1. This will be cited as failure to comply with the QAM.

The following items were closed:

NRC Violation 83-43-03
LERs 83-143, 170, and 190; and 84-001, and 002

The resident inspector informed MP&L that an unresolved item would be issued based on his review of MP&L's implementation of Plant Administrative Procedure 01-S-04-17, "Mechanical Maintenance Retraining and Replacement Training Program". Based on his review, many questions had arisen pertaining to practical factors sheets being used to document the implementation of this program. The following questions were cited as examples of his concern:

- Numerous sign-offs had been completed within a short time. (As many as 10 in a day.),
- One individual has been signed off on his Practical Factors Sheet with a date which was prior to his employment with the company, and
- credit by exams were not supported by appropriate documentation.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

Report Nos.: 50-416/84-07

Licensee: Mississippi Power and Light Company
Jackson, MS 39205

Docket No.: 50-416

License No.: NPF-13

Facility Name: Grand Gulf

Inspection at Grand Gulf site near Port Gibson, Mississippi

Inspector:

A. G. Wagner

3-23-84
Date Signed

Approved by:

C. A. Julian
C. A. Julian, Section Chief
Division of Project and Resident Programs

3/27/84
Date Signed

SUMMARY

Inspection on February 16 - March 9, 1984

Areas Inspected

This routine, announced inspection involved 40 inspector-hours on site in the areas of Operational Safety Verification, Maintenance Observation, Surveillance Observation, Reportable Occurrence, Plant Safety Review Committee Activities, and Emergency Drill Observation.

Results

Of the six areas inspected, no violations or deviations were identified in five areas; two apparent violations were found in one area (paragraph 10.c, failure to follow procedure and paragraph 10.d, failure to provide procedure).

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- J. Cross, Plant Manager
- *R. F. Rogers, Assistant Plant Manager - Operations
- *C. R. Hutchinson, Assistant Plant Manager - Maintenance
- *J. W. Yelverton, Assistant Plant Manager - Support
- *J. D. Bailey, Compliance Coordinator
- *L. F. Daughtery, Compliance Supervisor
- *D. L. Hunt, Training Superintendent
- *J. E. Jones, Training Instructor

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

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on March 9, 1984, with those persons indicated in paragraph 1 above. The licensee acknowledged the inspection results.

3. Licensee Action on Previous Enforcement Matters

(Closed) Violation 416/83-43-03: The inspector has reviewed the corrective actions, results achieved and steps taken to avoid recurrence stated in Mississippi Power and Light Company letter AECM-84/0062 dated January 26, 1984. The inspector considers the corrective actions and steps taken to prevent recurrence to be satisfactory; therefore, this item is closed.

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 10.e.

5. Operational Safety Verification

The inspectors kept themselves informed on a daily basis of the overall plant status and any significant safety matters related to plant operations. Daily discussions were held with plant management and various members of the plant operating staff.

The inspector made frequent visits to the control room such that it was visited at least daily when an inspector was on site. Observations included instrument readings; setpoints and recordings; status of operating systems; tags and clearances on equipment controls and switches; annunciator alarms; adherence to procedures; adherence to limiting conditions for operation; temporary alterations in effect; daily journals and data sheet entries; control room manning; and access controls. This inspection activity included numerous informal discussions with operators and their supervisors.

Weekly, when onsite, a selected ESF system is confirmed operable. The confirmation is made by verifying the following; accessible valve flow path alignment; power supply breaker and fuse status; major component leakage, lubrication, cooling and general condition; and instrumentation.

General plant tours were conducted on at least a biweekly basis. Portions of the control building, turbine building, auxiliary building and outside areas were visited. Observations included safety-related tagout verifications; shift turnover; sampling program; housekeeping and general plant conditions; fire protection equipment; control of activities in progress; radiation protection controls; physical security; problem identification systems; and containment isolation.

No violations or deviations were identified in the areas inspected.

6. Maintenance Observation

During the report period, the inspectors observed the below listed maintenance activities for procedure adequacy, adherence to procedure, proper tagouts, adherence to Technical Specifications, radiological controls, and adherence to Quality Control hold points.

P41747 24 VDC Relay - Wiring verification

M41341 (RWCU) Filter Demineralizer Vessel Tubesheet 'B' - Leakby inspection

No violations or deviations were identified in the areas inspected.

7. Surveillance Testing Observation

The inspectors observed portions of the performance of the below listed surveillance procedures. The inspection consisted of a review of the procedure for technical adequacy, conformance to Technical Specifications, verification of test instrument calibration, observation on the conduct of the test, removal from service and return to service of the system and a review of test data.

06-ME-1M61-V-0001, Revision 21, Local Leak Rate Test, Penetration 21, valves E12F037B, E12F107B and E12F027B.

06-OP-1P75-V-0011, Revision 21, Standby Diesel Generator Functional Test - Division II.

No violations or deviations were identified in the areas inspected.

8. Reportable Occurrence

The below listed Licensee Event Reports (LERs) were reviewed to determine if the information provided met NRC reporting requirements. The determination included adequacy of event description and corrective action taken or planned, existence of potential generic problems and the relative safety significance of each event. Additional inplant reviews and discussion with plant personnel as appropriate were conducted for the reports indicated by an asterisk. The following LERs are closed.

<u>LER No.</u>	<u>Date</u>	<u>Event</u>
83-109	07-27-83	Shutdown Cooling Isolation
83-143	09-28-83	Component Cooling Water Process Radiation Monitor not in operation.
*83-170	10-26-83	RCIC Turbine Latch Failure
84-001	01-03-84	ESF Actuation when battery charger placed in equalize
84-004	01-14-84	Shutdown Cooling Isolation

The following LERs remain open with comments as noted.

*83-177	02-13-84	Air Ejector off-gas Monitor Inoperative.
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The LER is held open pending a determination of the adequacy of the corrective action.

9. Plant Safety Review Committee Activities

The inspector attended a Plant Safety Review Committee (PSRC) meeting on March 6, 1984. The minutes of the PSRC meeting held between December 26, 1983 and February 29, 1984, were reviewed by the inspector. A verification was made to assure that membership composition, meeting frequency, meeting minutes were satisfactory and full agreement was reached on all matters and that the Technical Specification and Plant Administrative Procedure 01-S-01-11, PSRC, requirements were met.

No violations or deviations were identified in the areas inspected.

10. Emergency Drill Observation

On March 7, 1984, the inspector observed the conduct of a plant emergency drill. The inspector observed the operability of emergency equipment, facility systems, on-site first aid facilities, various systems and equipment used to monitor the release of radioactivity from the plant and the use of various communications. The inspector monitored at various times during the drill, the activities and personnel actions in the control room, technical support center, operational support center and emergency operations facility. Emergency response team training and qualification records were reviewed to ensure that the team members are properly trained and certified. During the above inspection, the following observations were noted:

- a. The shift superintendent instructed the unit operators and drill participants on the conduct of operations during the drill. The operations drill participants were directed to perform all operations and evaluations as directed by the shift superintendent unless directed by a drill observer to simulate the evaluation. This would in effect place the operation of the plant under the direction of an untrained, unqualified drill observer. In addition, directions to the unit operators were unclear as to how they were to distinguish and from whom directions for unit operations were to be taken. The inspector is concerned that control of plant operations is not well planned in advance and appropriate direction and guidance is not provided by the responsible emergency preparedness personnel. This will be reviewed during subsequent emergency drills. This will be identified as inspector followup item 416/84-07-01.
- b. The inspector noted several instances in which a licensee drill observer was acting as an escort for a visitor and appeared not to have control of the visitor as required by plant security instructions. This matter has been referred to Region II and will be followed-up during the next security inspection.
- c. During the review of the training records for the response team members, the inspector noted that two of the team members did not have or were not current for the required training. Plant Administrative Procedure 01-S-04-21, Revision 3, Emergency Preparedness Training Program, paragraph 6.6 requires response technicians to have received EPTS-9, Multi-Media First Aid and EPTS-11, Response Team Training. The failure to have the two response team members properly trained is an apparent violation and will be identified as violation 416/84-07-02, failure to follow procedure.
- d. During the review of the training records for the response team leaders, the inspector noted that two of the leaders were not permanent supervisors. Upon inquiry, the inspector was informed that the supervisors were mechanics that were temporarily upgraded to supervisory status. One of the supervisors had been upgraded for approximately one month, the other was a recent upgrade. Plant

Administrative Procedure 01-S-04-17, Revision 4, Mechanical Maintenance Retraining and Replacement Training Program, paragraph 6.1.3 describes the Maintenance Supervisor Training Program. The supervisors upgraded did not meet the program requirements. The inspector was informed that upgrading is allowed by ANSI-N18.1-1971, paragraph 3.1. 10 CFR 50, Appendix B, Criterion V, as implemented by the licensee's approved QA program MPL-Topical-1A, requires that activities affecting quality be prescribed by appropriate procedures or instructions. The failure to prescribe the procedure for upgrading temporary supervisors is an apparent violation and will be identified as violation 416/84-07-03, failure to provide procedure.

- e. During the review of the training records for the response team, the inspector noted that the practical factors cards for the mechanics were not in the training files. These cards are required by Plant Administrative Procedure 01-S-04-17, Revision 4, Mechanical Maintenance Retraining and Replacement Training Program. The inspector was subsequently provided with copies of these cards. It was noted that none of the cards were completed. One of the cards had signatures and dates entered for required tasks that were dated before the person had been employed by the licensee. The licensee stated that credit for prior employment experience had been given to this individual. The inspector is concerned with the qualifications and the process of qualifying the mechanical maintenance personnel for their position. This will be identified as unresolved item 416/84-07-04, pending further review and inspection by the NRC.

TO WHOM IT MAY CONCERN:

I sat down with each of my crew and talked with each one on Qualification Cards. I was under the impression that we could go back to past experience. Also before a man was hired at Grand Gulf he had to have 3 years or more experience to come in as a Junior Mechanic. Therefore, I went back to his past experience as well as work performed at Grand Gulf to fill out my Qualification Cards.

Bill Bradley

Bill Bradley

3/15/84

BWSES

636-4254

Home: |

MEMO TO: File

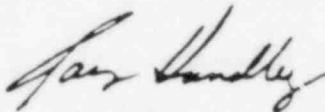
FROM: Ray Handley

SUBJECT: Mechanical Maintenance Qualification Card

Mr. Bradley called me back to his office, to fill out mechanical qualification questions. Questions on some parts like thrust bearings, valves, pumps, pump couplings, and alignment of couplings were learned on other jobs, I have had before employment here at GGNS. These were the dates that Mr. Bradley put down on the qualification sheets.

From what I understand now, it seems that he should have left them blank, until I performed them here, in front of a witness.

It looks to me as there was just a misunderstanding on how to fill the sheets out.



Ray Handley
3/16/84

MAINTENANCE QUAL. CARD ISSUE

1. Regulatory Commitments

FSAR 13.1.3.1-...GGNS shall meet or exceed requirements of ANSI N18.1-1971.

A review of training records by Maintenance Training Supervisors, Site QA, and Maintenance Superintendents indicates that all of our maintenance personnel in journeyman and supervisory positions have been properly certified to ANSI N18.1-1971 standards and that the training records accurately document this fact.

2. Improper Qual Card Signoff

A review was conducted of all maintenance qual. cards including those completed and returned to the Training Department.

The only discrepancy discovered was signed off by his supervisor, B. Bradley. This card contained signoffs by the supervisor that dated the mechanic's employment date with the company.

B. Bradley and R. Handley were questioned and both indicated that those signoffs were based on Handley's previous experience. Our program allows for credit by previous experience and provides a mechanism in paragraph 6.1.4 of 01-S-04-17 for documenting this. Bradley did not document the credit by previous experience signoffs properly.

A review of Handley's training record reveals that he is properly certified to ANS 18.1 and that he has adequate documented previous experience (Navy Machinist Mate, Carbide Maintenance Man, Shipyard Pipefitter) in his training record to justify the signoffs on the qual. card based on previous experience.

BOTTOM LINE:

The signoffs in question on Handley's qual. card taking credit for previous experience were not done in accordance with our procedures.
(See Attached Memo)

MEMO TO: F. H. Walsh
Discipline Maintenance Superintendents
Discipline Maintenance Supervisors

FROM: C. R. Hutchinson

SUBJECT: Maintenance Qualification Card signoff

IPC: 84/2075

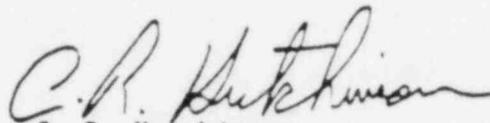
Recently during an audit of training records it was discovered that a qualification card contained signoff's by a supervisor pre-dating that individual's date of employment with MP&L.

On the surface this would appear to be a fraudulent qualification card signoff, especially to an audit agency. Investigation into this matter has revealed that this was not the case but that credit was being taken for prior experience. This is permissible under our training program, however, it must be done in accordance with our procedures. The purpose of this memo is to re-emphasize these procedural requirements to you. 01-S-04-17 Rev. 3 Mechanical Maintenance Retraining and Replacement Program states in Para. 6.1.4 "..... credit by evaluation of past experience is given Experience will be evaluated on a case by case basis by the Training Superintendent. Based on this evaluation the Training Superintendent may waive specific portions of the individual's training program. When a waiver is granted, the specific sections affected on the individual's training record and/or qualification cards shall be signed by the Training Superintendent with the lettersCPE adjacent to his signature and the date". Procedures 01-S-04-18 and 19 for Electrical and Mechanical Training Programs contain similar words.

All Maintenance Supervisors and Discipline Superintendents are directed to read and thoroughly familiarize themselves with the procedures governing Training and Qualification of Maintenance Personnel. These procedures are:

- 01-S-04-17 Mechanical Maintenance Retraining and Replacement Program
- 01-S-04-18 Electrical Maintenance Training Program
- 01-S-04-19 I&C Section Training Program

Questions arising from this review and familiarization should be brought to the Maintenance Superintendent for resolution with the training department.



C. R. Hutchinson
Assistant Plant Manager, Maintenance

CHR:gw

cc: J. E. Cross
J. Jones
D. Hunt
J. Yelverton
Plant File

MEMO TO: R. V. Mooney
D. O. Steer
E. E. Wilson

FROM: F. H. Walsh

SUBJECT: Practical Factor Sheets

IPC-84/2253

BACKGROUND: Training Procedures 01-S-04-17, 01-S-04-18, and 01-S-04-19 have been issued to provide experience, formal training, and practical factors records for Mechanical, Electrical, and Instrument Department personnel respectively. The above procedures provide general guidelines for the completion and handling of these training records. This memo will provide detailed guidelines for the completion and handling of the Practical Factors Sheets contained in each of the above procedures and will remain in force until superceded by new revisions to the referenced procedures which contain these same guidelines.

DISCUSSION: Individual practical factor task signoffs may be completed by the Maintenance Supervisors under two different circumstances each of which is addressed separately below. In either case, the date filled in beside the signature block shall be the date that the signature was affixed and the task completed.

CASE I: Physical Observation of the Individual Performing the Practical Factor Task

This case occurs when the Maintenance Supervisor personally witnesses the task being performed in a safe and correct manner by the individual to whom credit for the successful performance of the task is to be given. An individual may not receive credit for the performance of a practical factors task while a member of a "crew" unless he personally performed the task while being observed by his Supervisor. When the Supervisor has witnessed the successful performance of a task, the Practical Factors Sheet for the individual is to be signed off that same day. Case I is expected to be the normal method for individuals to have their Practical Factors Sheets completed by their Supervisors.

CASE II: Credit for Previous Training and Experience

Due to the large numbers of incumbent personnel at Grand Gulf, a method has been provided in each of the referenced procedures to allow credit for previous training and experience obtained both at Grand Gulf and prior to Grand Gulf. When a Maintenance Supervisor wishes to take credit for previous training and experience, he should generate an IPC memo for his superintendent's signature to the Training Superintendent detailing the extent and nature of the previous training and experience. This memo should contain copies of resumes, transcripts, diplomas, and any other documentation which will establish the validity of the previous training and experience for which credit is being sought.

This memo should further define exactly which practical factor tasks the previous training and experience is intended to fulfill. Upon acceptance of the information contained in the memo, the Training Superintendent will sign the practical factor tasks for which the previous training and experience has been accepted in lieu of physical performance. The memo provided by the Discipline Superintendent will serve as documentation of the previous training and experience accepted by the Training Department and will remain with the Practical Factors Sheet as a permanent record. The date placed by the signature block shall be the date that the block was signed indicating acceptance of the previous training and experience by the Training Department.

As detailed above, only Maintenance Supervisors shall witness and give practical factor task signoffs for physical performance of the task. Only the Training Department will give credit for a practical factor task by previous training or experience. In no case is a Maintenance Supervisor to allow credit for a practical factor task by any other method than that outlined as Case I.

ACTION: Compliance with this memo is mandatory. Practical Factors Sheet which have been previously completed are to be re-evaluated on a task by task basis and signatures crossed out, initialed, and dated in those cases where the signature was affixed under conditions other than those allowed by this memo. Each Discipline Superintendent is to review the Practical Factors Sheet of each man in his section who has a previously completed or partially completed Practical Factors Sheet with that man's supervisor and sign the Practical Factors Sheet indicating that the above review has been completed and that the signed tasks remaining on the Practical Factors Sheet were affixed in accordance with this memo. The date of the Discipline Superintendent's signature shall be the date that the review took place. All signatures past the review date shall be in accordance with the contents of this memo.

F. H. Walsh

F. H. Walsh

3/27/84

Concurrence:

[Signature]
Training Supt.

FHW:at

cc: J. E. Cross
C. R. Hutchinson
J. W. Yelverton
Maintenance Supervisors
Plant File

PLANT QUALITY DEFICIENCY TRANSMITTAL FORM

To: GGNS Plant Manager ()
Unit 2 Project Manager ()
Manager of Quality Assurance ()
Chairman, PSRC ()
Nuclear Plant Engineering- O.A.S. ()

Other: (X) MAINT. SVPT.

From: Plant Quality Superintendent

Transmittal Date: 3-15-84

Subject: P.Q.D.R. 101-84

File No. 0290/0490/0491/15717

Transmittal No. 84/00 261

Instructions:

- (X) The attached PQDR requires disposition action. Please complete the Disposition Section in accordance with OI-S-03-2 and/or assign the disposition to a responsible party for completion.
- () The attached PQDR requires a technical evaluation for safety relatedness and/or NRC reportability under 10CFR50.55(e), 10CFR21 or USNRC Regulatory Guide 1.16. Please evaluate and submit a report for the PQDR file.
- () The attached PQDR requires your review. Please expedite and return to Plant Quality.
- () For your information.
- () Other/Additional Instructions: _____

CC: Manager QA (X)
Q.A. Ops. Supv. (X)
Asst. Plant Manager (X) MAINT
Nuclear Plant Manager ()
Compliance Supt. (X)
PSRC (X)
Unit 2 Project Mgr. ()

PQDR File (X)
Supv. Corp. Reg. Compl. ()
Other: _____

ERM(17)

TTL
PLANT QUALITY DEFICIENCY REPORT (PQDR)

RT F2.09
INITIALS
NUMBER OF PAGES:
DATE:
RELATED DOCUMENT
NUMBER=

R 101 - 84 SHEET of

Potential Safety Related Deficiency:

Three (3) miscellaneous plant trailers were present to ~~be removed~~ ~~removed~~ without completing all requirements of procedure PL-S-04-17. (David Williams, Danny Shans; ~~Bill~~ ³⁻¹⁵⁻⁸⁴ C.E. Anding)

HAND CARRY TO PLANT QUALITY
DO NOT MAIL OR ROUTE.

(Bill Anding) Originator/Title/Date
Bill Anding 3/15/84

	YES	NO
Safety Related	(X)	()
Potential 10CFR50.55(e)	()	(X)
Potential 10CFR21	()	(X)
Action Required	(X)	()
P.R.D. Evaluation Requested	()	(X)
Potential Tech. Spec. Reportable	()	(X)

Evaluated by: Curtley Hays 3-15-84
Name Date

EVALUATION CHECK SHEET MUST BE ATTACHED
FOR POTENTIAL REPORTABLE DEFICIENCIES.

I.R.: N/A Ed [Signature] 13/15/84
Compliance Supt./Date

Concurrence: Curtley Hays 13/15/84
Name Date

Disposition Action Required From:

- () Nuclear Plant Manager
- () Unit 2 Project Manager
- () Manager QA
- (X) Other MAINT SUPT.

DISPOSITION RESPONSE DUE DATE:

4-26-84

Cause:

Corrective Action and Action to Preclude Recurrence:

Corrective Action Completion Date

Responsible Section Supervisor Date

Plant Quality Superintendent

Date

Nuclear Plant Manager

Date

PLANT QUALITY CONTROL

VERIFICATION METHOD: _____

CORRECTIVE ACTIONS VERIFIED AND PQDR CLOSED OUT:

Plant Quality Section

Date

Plant Quality Superintendent/Date