



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

AUG 06 1985

Docket Nos.: 50-445
and 50-446

Mr. W. G. Council
Executive Vice President
Texas Utilities Generating Company
400 N. Olive Street, L. B. 81
Dallas, Texas 75201

Dear Mr. Council:

Subject: NRC Staff Evaluation of the Qualifications and Training of
Operators at the Comanche Peak Steam Electric Station (CPSES)

On July 9 and 10, 1985, Don Beckham, Acting Deputy Director, Division of Human Factors Safety (DHFS) and Larry Crocker, Management Section Leader (DHFS) accompanied Charles Trammell, Comanche Peak Task Force Project Manager to the CPSES Site. An audit of the qualifications and training of the operating staff personnel was conducted. Records for license candidates (5 successfully licensed, two repeat failures) and all five Shift Advisors were reviewed. The review was conducted against the approved FSAR program description and CPSES procedures TRA-204 and TRA-299, the implementing procedures for licensed operator requalification training and shift advisor training, respectively.

The audit indicated that not only was all required training being conducted, but also several additional steps were being taken by the applicant to maintain and enhance operational readiness.

1. A comprehensive program to send all licensed operators to observe and participate in evolutions at operating units has been ongoing for some time. All Shift Supervisors and Assistant Shift Supervisors will have been to at least six weeks of training. Plants are chosen to take advantage of special evolutions similar to expected activities at CPSES, such as Diablo Canyon's initial criticality and start-up testing. Non-supervisory personnel are being sent for observation training now.

2. The applicant makes extensive use of the plant-referenced simulator in the training of operations personnel. Each shift trains together in a 1 in 6 rotation. The Shift Advisors participate with the shifts in requalification training, rotating among the shifts to provide information exchange and familiarity. At the end of each week's training, a comprehensive exercise is conducted on the simulator involving the Shift Advisors, the Control Room Supervisors and crew and the other operations personnel, including Auxiliary Operators, Instrumentation and Control Technicians, etc. The drills concentrate on team functions, communications, and anticipating problems.
3. The applicant has extremely strong coordination between the operations department and the training department. There was excellent information flow and cooperation. Learning deficiencies were documented and related to individuals, with specific upgrade requirements identified, or to program deficiencies.
4. The plant-referenced simulator was being used to validate all plant procedures. The operators and plant engineers were conducting test procedures, start-up procedures, and normal plant procedures on the simulator to ensure their accuracy and usefulness.
5. CPSES personnel were conducting all preoperational testing on Unit 2 systems. This practice had been instituted on Unit 1 and was being continued on Unit 2.
6. CPSES is committed to INPO Accreditation and an INPO site visit is scheduled in the near future.

The audit team also discussed the NRC letter (V. S. Noonan to M. D. Spence) dated March 1, 1985 in which NRR indicated the acceptability of continuing use of Shift Advisors at CPSES after March 1985. The team pointed out that the letter encouraged them to use any additional delay to improve their operators' experience, and questioned them on their intent to continue the use of Shift Advisors. Mr. Kuykendall indicated that CPSES would use Shift Advisors regardless of NRC requirements. He indicated that the advisors had become a valuable addition to their operating staff and would be retained through full power operation.

We request that Texas Utilities provide a statement on your intent regarding Shift Advisors and a description of the additional factors in support of a request to continue use of the Shift Advisors to meet Generic Letter 84-16, and to allow continuation of the program currently underway to enhance the operational experience of all licensed operators.

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The DHFS prepared a supplemental safety evaluation report on the current status of staffing, and the qualification and training of operating personnel, as a result of the described audit. We propose to include the enclosed evaluation (portions on organization changes excepted) in a forthcoming SSER.

Please advise Mr. S. B. Burwell, of my staff, when we may expect a response to the above request.

Sincerely,

ORIGINAL SIGNED BY:

Vincent S. Noonan, Director
for Comanche Peak Project
Division of Licensing

Enclosure:
Supplemental Safety
Evaluation Report

cc: See next page

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W. G. Council
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Comanche Peak Steam Electric Station
Units 1 and 2

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