



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

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MEMORANDUM FOR: Chairman Palladino  
Commissioner Roberts  
Commissioner Asselstine  
Commissioner Bernthal  
Commissioner Zech

FROM: William J. Dircks  
Executive Director for Operations

SUBJECT: POST-ACCREDITATION AUDITS OF UTILITY TRAINING PROGRAMS  
BY NRC STAFF

During the November 6, 1985, Commission meeting with NUMARC, Mr. Warren Owen, Senior Vice President for Duke Power and the Vice Chairman of NUMARC, requested that the Commission direct the staff to not conduct Post-Accreditation Audits of utility training programs. In a letter dated October 16, 1985, INPO also requested that Post-Accreditation Audits of utility training programs be terminated.

I have directed the staff to proceed as planned to conduct its second Post-Accreditation Audit at Dresden during the week of November 18, 1985. The first Post-Accreditation Audit was conducted at Susquehanna, October 21 thru October 23, 1985. The staff has not yet completed its report on the findings from the Susquehanna visit.

The Commission's Policy Statement on Training and Qualifications of Nuclear Power Plant Personnel issued March 20, 1985, identifies five elements considered essential to an acceptable training program. The staff's Training Review Criteria and Procedures document was completed in June of 1985 and provided to INPO on August 12, 1985. The review criteria are identical to the five elements contained in the Commission's Policy Statement. They are:

- ° Systematic analysis of the jobs to be performed
- ° Learning objectives that are derived from the analysis and that describe desired performance after training
- ° Training design and implementation based on the learning objectives
- ° Evaluation of trainee mastery of the objectives during training
- ° Evaluation and revision of the training based on the performance of trained personnel in the job setting

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The procedures for training reviews are similar to those of an IE Inspection Module. The procedures are broken into five sections, each section correlates directly to one of the five elements of the Commission's Policy Statement. In addition, the procedures provide observation checklists to assist an NRC observer in evaluating classroom training, laboratory sessions, on-the-job training in the plant and/or simulator training. The staff proposes to use these procedures to determine whether or not a training program accredited by INPO meets these five elements.

INPO's objectives and criteria for accreditation have been reviewed by the staff and endorsed by the Commission as encompassing the elements of an acceptable training program. INPO's objectives and criteria and supporting INPO documentation are much more specific and detailed than the five elements contained in the Commission's Policy Statement. However, as discussed above, the staff's Post-Accreditation Audits of utility training programs are based upon the five elements contained in the Commission's Policy Statement and not upon the 12 objectives and 72 criteria specified by INPO for accreditation.

In September 1985, the staff identified to INPO the first three plants at which Post-Accreditation Audits would be conducted. INPO was encouraged to provide an observer for these audits. Subsequently, in October, INPO declined to send an observer and took the position on October 16, 1985, that such audits should not be performed.

The staff experienced communication problems with the utility during the Susquehanna post-accreditation review and our preparation for the site visit can be improved. The lessons learned from the Susquehanna visit are being factored into staff preparation for the Dresden audit. This includes the team visiting INPO the week prior to the plant visit in order to review the Dresden final accreditation report and to discuss with INPO our approach to Post-Accreditation Audits. The staff disagrees with NUMARC's statements during the Commission meeting that the staff was not trained or qualified to conduct post-accreditation audits. The Team Leader has participated as an observer on an INPO Accreditation Team Visit and is very familiar with the INPO Accreditation process. The NRR Team Members were provided training by INPO on the training accreditation process. The regional staff, while not specifically trained in the accreditation process, had prior experience in operator examination and licensing and in training inspections, and were assigned review responsibilities which were compatible with their experience and background. The staff report on Susquehanna, when issued, should be the measure which is used to judge the quality of staff's review at Susquehanna.

The staff believes that the Commission's Policy Statement directed the staff to closely monitor the accreditation process and its results. It specifically stated that "it remains the continuing responsibility of the NRC to independently evaluate applicants' or licensees' implementation of improvement programs to ensure that desired results are achieved and to evaluate the possible need for further NRC action based on success of industry program after a two-year period." The staff believes that an evaluation of program effectiveness necessarily involves an evaluation of a

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training program after it has been accredited to determine how effectively it is being implemented by the utility and to determine whether the five elements, considered essential by the Commission, are being met. The NUMARC counterproposal to Post-Accreditation Audits is to increase the number of INPO accreditation plant visits observed by the staff. This would provide a slightly better understanding of the INPO process, but would not address the issue of the effectiveness of the program implementation, nor provide an opportunity for independent programmatic evaluation. Staff observation of approximately 20 percent of the INPO accreditation team visits is a sufficient sample to determine the quality of the INPO process.

While we intend to proceed with the Dresden post-accreditation visit the week of November 18, it may be well to reflect upon whether or not there is a more effective way to ensure the effectiveness of program implementation. We will do so.

(Signed) William J. Dircks  
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Executive Director  
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Revised in DEDROGR Office 11/13/85  
\*See attached for previous concurrences

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