

SUBJECT: Licensed Operator Training & Qualificatio

REPORT NO.: MAR 83/0133, Unit 1

AUDIT DATES: October 21-24, 1983

ORG/ACT.: Training

AUDIT SCOPE: Verification of training and qualification of licensed operator candidates to FSAR 13.2 requirements; and the review of license applications submitted to the NRC for correctness.

CRITERIA: 10CFR55, Operator's Licenses  
Final Safety Analysis Report (FSAR) Section 13.2, "Training"  
AECM-83/0681, from J. P. McGaughy, Jr. to NRC (Draft)

SUMMARY: This monitoring audit was conducted to verify that the information submitted on Senior Reactor Operator (SRO) and Reactor Operator (RO) license applications is in compliance with FSAR SRO and RO training commitments. The overall audit results indicate that training and qualification of licensed operators is being accomplished and controlled, though not documented adequately in all areas. Those areas are discussed in the Findings Section. During the audit, 14 RO's and 21 SRO's training files were reviewed. The files reviewed were as follows:

RO	SRO
1.	1.
2.	2.
3.	3.
4.	4.
5.	5.
6.	6.
7.	7.
8.	8.
9.	9.
10.	10.
11.	11.
12.	12.
13.	13.
14.	14.
	15.
	16.
	17.
	18.
	19.
	20.
	21.

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The portions of the applications documenting training received by the above listed personnel were utilized as checklists for this audit. Application entries were verified, where possible, against licensing records. Criteria used to verify completion of training was as follows (one or more of the criteria was required before satisfactory completion was credited):

1. Records of course attendance and passing of final exam
2. Satisfactory completion of challenge exam
3. Satisfactory completion of make-up exam
4. Certification of satisfactory completion of training

B9  
86  
411

B9

## SUMMARY: (con't)

Where possible, actual grades were verified to assure a passing score was obtained or that the course was passed if a pass/fail criteria was used, such as in the case of oral exams.

FINDINGS: The following areas were found to be satisfactory during the course of this audit:

- Entries made in the last 12-15 months on Individual Training History records have fewer errors and are generally neater than those prior to that time.
- Credit by Examination and Credit by Previous Experience are being appropriately applied to license candidates.
- The majority of training records for each license applicant are readily retrievable and clear as to documentation.

The following areas were found to be unsatisfactory during the course of this audit:

- Documentation for some FSAR Section 13.2 commitments for licensed operators is not available; has not been obtained from training contractor(s) in all cases. See CAR 2042 for details. ←
- Information submitted on a number of license applications per 10CFR33.10(a) has been incorrect and, in some instances, unsubstantiated. See CAR 2042 for details. ←

Certain discrepancies in license applications had been previously identified and documented by Plant Staff. During the course of the audit the following additional discrepancies were found. See CAR 2042 for details. ←

1. Two applications reported two weeks of Requalification Training in the areas of Procedures and Bases, and Plant Operations and Casualty Response; review of training records indicated that this training was actually nine days in length. The applications were for [REDACTED] both SRO's.
2. One application reported a one-day Fire Brigade Training course; training records documented this course as a four-hour course. The application was for [REDACTED] SRO.
3. One application reported an Introduction to Nuclear Power course as being of five months duration; training records revealed the actual length of this course to be four and one-half months. The application was for [REDACTED] SRO.
4. Review of training records for one applicant revealed that he failed Cycle 3 of Cold License Training in addition to Cycles 9, 11 and 12 as previously identified by Plant Staff. The applicant was [REDACTED] RO.

CAR 2042

## FINDINGS: (con't)

5. One application reported completion of a one-week Mitigation of Core Damage course conducted by General Physics (GP). Review of training records indicated that applicant failed course. There was no evidence of a make-up exam to this course. Applicant did take and pass a different one week course in Mitigation of Core Damage. The applicant was [REDACTED] RO.
6. The first application for one applicant indicated completion of several courses; second application indicated that applicant received credit by examination for these courses in lieu of attendance in these courses. Review of training records revealed that the latter was the actual case. Applicant was [REDACTED] SRO.

All of the above discrepancies were added to discrepancies documented in AECM 83/0681 (Draft).

In addition, two previously documented discrepancies were resolved. Plant Staff had stated in draft of AECM 83/0681 that no documentation could be found for nine weeks of Operator Upgrade Training (OUT) for two applicants. Records for ten weeks OUT were found for each of the applicants. Applicants were [REDACTED] SRO; and [REDACTED] RO.

- Some required entries in Individual Training History records have been inconsistent, incorrect or omitted. These discrepancies were corrected during the course of the audit.
- Qualification Cards as committed to in FSAR Section 13.2 have not been completed, or cannot be located as indicated on the license applications. (Previously documented on PQDR-007-83; no additional action required by Plant Staff).

## OBSERVATIONS/COMMENTS:

1. A copy of applicant denial letters from the NRC should be sought from the applicant for all cases for which the MP&L copy did not reach the training file. Application for re-examination of candidates should not be sought based solely on oral descriptions by candidates without a copy of denial letter being available.
2. Review of self study courses used in applications should either be indicated as not being documented on the application or some minimal documentation should be maintained on the Individual Training History record.

PERSONS CONTACTED:

<u>NAME</u>	<u>TITLE</u>	<u>PRE-AUDIT CONFERENCE</u>	<u>DURING</u>	<u>POST-AUDIT CONFERENCE</u>
D. L. Hunt	Training Supt.	X	X	X
J. W. Yelverton	Assistant Plant Mgr.	X	X	X

CHECKLIST USED: MAR 83/0133-1

DOCUMENTED NONCONFORMANCE: CAR 2042

AUDIT TEAM MEMBER: William C. Eiff  
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11/2/83  
Date

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