



MISSISSIPPI POWER & LIGHT COMPANY
Helping Build Mississippi

J. G. Reynolds
John Reynolds

January , 1984

Mr. J. P. O'Reilly
Nuclear Regulatory Commission
Region II
101 Marietta Street, N. W.
Atlanta, Georgia 30303

Grand Gulf Nuclear Station
SUBJECT: Inspection of the GGNS
Training Program
AECM-84/

Dear Mr. O'Reilly,

The NRC conducted a routine inspection on October 31 through November 4, 1983, of the Grand Gulf Nuclear Station, and noted several deviations from the training program. As a result of this inspection, MP&L removed from licensed duties three individuals who exhibited deficiencies during plant walkthroughs and one recently licensed individual whose qualification card signoffs were suspect.

As you are aware, MP&L initiated an Operator Requalification Program in mid-November 1983, and began orally re-examining all NRC licensed operators on Grand Gulf Systems. The operators were divided into two groups, with one group assigned on-shift and one group assigned to the Requal Program full-time. The first group is essentially complete with their requalification.

The following three individuals were removed from licensed duty in early November and were included in the first group of candidates being qualified. The names and their status of completion of total requalification is as follows:



- Systems Qualification complete.
- Practical Factors complete.
- Procedure Qualification (ONEP's, EP's and IOI's) complete.
- Operator Training Evaluation Board (OTEB)
 - Successful review of training records.
 - Successful evaluation of ability.
 - Successful evaluation by independent, General Electric, exam

B10
BT
E3

8603040516 851224
PDR FOIA
REBER85-419 PDR

B10



System Qualification complete.
Practical Factors complete.
Procedure Qualification complete.
Operator Training Evaluation Board (OTEB)

- Review of training records revealed one weak area (diesel training). Required training will be complete 1/7/84.
- Successful evaluation of ability.

incomplete



System Qualification complete.
Practical Factors complete.
Procedure Qualification complete.
Operator Training Evaluation Board (OTEB)

- Review of training records revealed one weak area (diesel training). Required training will be complete 1/7/84.
- Successful evaluation of ability.
- Successful evaluation by independent, General Electric, examiner

incomplete

The above information is presented as a summary of the supplementary training provided to the individuals. MP&L intends to provide a comprehensive report at the end of the program that addresses the total amount of training that all operators received.

In addition, this information is also presented for your consideration and review. MP&L will notify you when the one training item on the last two candidates is complete. At that time, MP&L considers all required corrective action on the three individuals to be complete and respectfully requests reinstatement of their licenses.

Yours truly,

J. P. McGaughy, Jr.

CORRECTIVE ACTION REQUEST

CAR No. 2053
Audit No. :MAR 83/0161

Unit I

Date: February 15, 1984
Initiator: W. E. Edge/W. C. Eiff

FINDINGS:

1. Credit by Previous Experience is not being appropriately applied to license candidates in two cases of a degree not meeting FSAR 13.2.1.1.12 requirement for "...attainment of a baccalaureate or higher degree in the fields of nuclear engineering or nuclear sciences;..." Adequate documentation to support the previous experience is not always available specifically in 11 cases for nuclear navy experience. See item 1 and item 2.B under Discussion.
2. Documentation for FSAR commitment 13.2.1.1.2 "Nuclear Fundamental Training" for licensed Operators is either not available or insufficiently documented. See item 2.A under Discussion.
3. Documentation is inadequate to verify compliance with FSAR 18.1.4 (which addresses applications after initial criticality). See item 3 under Discussion.
4. Documentation is inadequate to assure FSAR 13.2.1.1.16 "Diesel Engine Training" commitments are being met for 3 RO's and 10 SRO's. See item 4 under Discussion.
5. Documentation on some requalification examinations was conflicting on the writer and grader of examinations used to verify conformance to FSAR 13.2.2.2.1 (2nd Sentence). See item 5.A under Discussion.
6. QA was unable to verify conformance to AECM-82/0179 dated 4/21/82 for the requalification examination Section 6 taken by one SRO applicant, and Section 3 taken by two RO applicants. The NRC administered and graded applicant's examination Section 6 and Section 3, but has not provided appropriate information to MP&L. See item 5.B and 5.C under Discussion.
7. No documentation was available to assure compliance with FSAR 13.2.2.1.2 on 1982 annual control manipulations for 11 SRO's. See item 6 under Discussion.
8. Documentation for FSAR 13.2.1.1.3 "Systems Operation Training" for licensed Operators is either not available or insufficiently documented. See item 7 under Discussion.

COMMITMENTS:

1. FSAR Section 13.2.1.1.12:
"13.2.1.1.12 Previous Nuclear Training

Other nuclear training programs or experience that satisfy the intent of the program outlined in subsection 13.2.1.1.1 may be substituted instead of portions of the training outlined for reactor operator and senior reactor operator candidates. Examples of such training programs or experience that would be permissible for substitution instead of portions of the training as described in subsection 13.2.1.1.1 are: attainment of a baccalaureate or higher degree in the fields of nuclear engineering or nuclear sciences; extensive participation in the design or design review of the station in nuclear-related areas; holding or having held a reactor operator's or senior reactor operator's license at a comparable reactor facility not subject to NRC licensing; e.g., reactor facilities operated by the military services or Department of Energy...."

B11
B8
B10

B11

COMMITMENTS: (con't)

2. FSAR Section 13.2.1.1.2:

"13.2.1.1.2 Nuclear Fundamentals Training

All license candidates shall receive approximately 12 weeks of class-room training in the science and engineering subjects listed below:..."

3. FSAR Section 18.1.4 in part:

"After initial plant criticality, the applicant shall possess at least six months of nuclear power plant experience at the Grand Gulf Nuclear Station. The applicant's onsite experience shall include either:

a. If the applicant does not hold or has not held an NRC Operator License on GGNS, the individual shall spend three months on shift carrying out the duties of the Control Room Operator while under the direct supervision of the Licensed Control Room Operator. The applicant shall also spend an additional three months on shift carrying out the duties of the Shift Supervisor while under the direct supervision of the Licensed Shift Supervisor.

b. If the applicant holds or has held an NRC Operator License on GGNS, the individual shall spend three months on shift carrying out the duties of the Shift Supervisor while under the direct supervision of the Licensed Shift Supervisor.

Additionally, after initial plant criticality, senior licensed operator applicants shall have held an NRC Operator License for a period of one year."

4. FSAR 13.2.1.1.16:

"13.2.1.1.16 Diesel Engine Training for Licensed and Non-Licensed Operators

All licensed and non-licensed operator personnel responsible for the safe operation of the emergency diesel generators shall have successfully completed the manufacturer's school or the equivalent for that component...."

5. FSAR 13.2.2.2.1 in part:

"13.2.2.2.1, Annual Requalification Examinations

.....These examinations will be prepared, administered, and evaluated by the Grand Gulf Training Section, or by the NRC at their direction....."

6. Letter to the NRC-AECM-82/0179, dated 4/21/82 in part:

"...SRO requalification exams to include in-depth questions on Nuclear Plant OP, theory of fluids and thermo, plant design/control/instrumentation, procedures, ADM control, Tech. Spec...."

7. FSAR 13.2.2.1.2 in part:

"13.2.2.1.1 Reactivity Control Manipulations

Each licensed operator will, during the term of his license, perform a minimum of 10 reactivity control manipulations."

COMMITMENTS: (con't)8. FSAR Section 13.2.1.1.3:
"13.2.1.1.3 Systems Operation Training

All license candidates shall receive approximately eight weeks of detailed classroom presentations covering each of the GGNS systems over which the licensed control room operator has control or cognizance. This training is designed such that upon completion, the student should be able to discuss the following topics for each of the plant systems:

- a. Purpose of the system, including design bases
- b. System components, including locations
- c. Normal and alternate system lineups
- d. Normal and alternate power supplies
- e. Associated limits and alarms
- f. Interrelationships with other systems
- g. Automatic features of system operation
- h. Associated instrumentation, indications, and controls
- i. Failure modes of controls and instruments
- j. Normal values for significant parameters
- k. Related technical specifications
- l. Related operating procedures

Written examinations are given during the systems operation training phase. In addition, oral examinations are given periodically on system design, function, and operation. Successful completion of the systems operation training requires a passing grade of 80 percent on all written examinations and satisfactory performance on all oral examinations."

CAR No. 2053

DISCUSSION:

Item 1

Based on a review of all RO and SRO applications and associated individual training files, QA is unable to verify Nuclear Navy experience (only reviewed in those cases where MP&L took credit for that Nuclear Navy experience on the application) per FSAR 13.2.1.1.12 except for two individuals [REDACTED]. [REDACTED] MP&L took credit for two of fourteen RO's as applied for and eleven of twenty-one SRO's as applied for. One RO, [REDACTED] had a DD214N form in his file, but it only showed job number. Note that of the thirteen individuals, only two had any form of verifiable evidence of Navy Service (DD-214 N's). No other copies of discharge forms, Navy training records, etc. were located.

Nonconforming RO's

- 1. [REDACTED]
- 2. [REDACTED]

Nonconforming SRO's

- 1. [REDACTED]
- 2. [REDACTED]
- 3. [REDACTED]
- 4. [REDACTED]
- 5. [REDACTED]
- 6. [REDACTED]
- 7. [REDACTED]
- 8. [REDACTED]
- 9. [REDACTED]

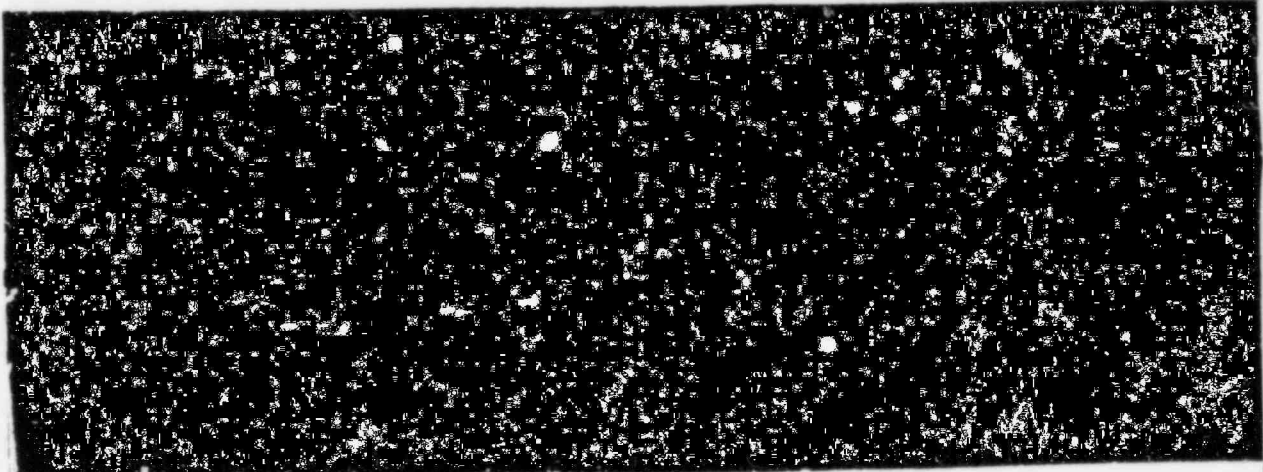
VS B
REF
TRAI

- Notes: ① Training Section has ordered DD-214 N's for these individuals.
 2. Existing DD-214 N has insufficient information.

Item 2

A.

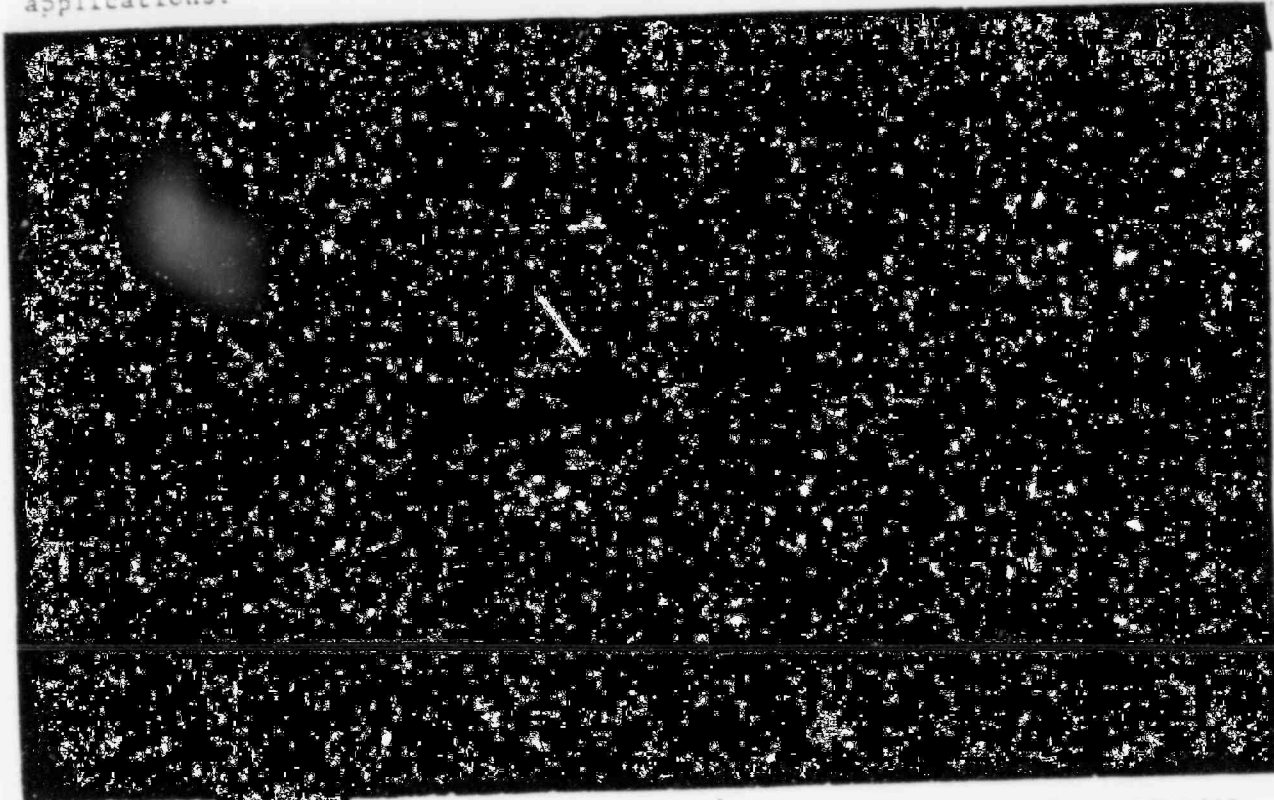
QA was unable to locate documentation which would indicate compliance with FSAR 13.2.1.1.2 Nuclear Fundamentals Training for the following RO applications:



- Notes: 1. Did not have the following courses: Reactor Theory, Radiation Detection, Radiation Protection, and Instrumentation and Controls.

Item 2: A. (con't)

QA was unable to locate documentation which would indicate compliance with FSAR 13.2.1.1.2 Nuclear Fundamentals Training for the following SRO applications:



- Notes: 1. [redacted] - Attended BRFI (Basic Reactor Fundamentals) on 1/21/77 for 1 week (Class No. 7601). Also attended Nuclear Reactor Fundamentals on 11/12/80, but no Class No., Time Span, or Location was listed.
2. [redacted] - Fulfilled the fundamentals requirement by attending 4 weeks of the 12 week course and taking 7 make-up tests, 5 of which were taken on 12/4/80, #8095, and 2 taken on 10/10/81, #81132.

5.

Further, in nonconformance with FSAR 13.2.1.1.12 (2nd Sentence) CPE was given for Fundamentals Training for two individuals although they did not have "...attainment of a baccalaureate or higher degree in the fields of nuclear engineering or nuclear sciences;...."

NAME	Degree
[redacted]	B.S. Physics
[redacted]	B.S. Electrical Engineering


CORRECTIVE ACTION REQUEST

CAR No. 2053

Page 6 of 8

Item 3


- A. QA was unable to locate documentation which would indicate compliance with FSAR 18.1.4 RESPONSE 4th paragraph: "...after initial plant criticality, senior licensed operator applicants shall have held an NRC Operator License for a period of one year."

<u>NAME</u>	<u>DATE OF APPLICATION</u>	<u>INITIAL CRITICALITY</u>
	9/1/83	8/18/82
	9/1/83	"
	5/25/83	"
	9/1/83	"
	10/8/82	"

- B. Further, QA was unable to verify FSAR 18.1.4 RESPONSE 3rd paragraph for the below listed applicants:

"After initial plant criticality, the applicant shall possess at least six months of nuclear power plant experience at the Grand Gulf Nuclear Station. The applicant's onsite experience shall include either:

- a. If the applicant does not hold or has not held an NRC Operator License on GGNS, the individual shall spend three months on shift carrying out the duties of the Control Room Operator while under the direct supervision of the Licensed Control Room Operator. The applicant shall also spend an additional three months on shift carrying out the duties of the Shift Supervisor while under the direct supervision of the Licensed Shift Supervisor.
- b. If the applicant holds or has held an NRC Operator License on GGNS, the individual shall spend three months on shift carrying out the duties of the Shift Supervisor while under the direct supervision of the Licensed Shift Supervisor."

<u>NAME</u>	<u>DATE OF APPLICATION</u>	<u>INITIAL CRITICALITY</u>
	10/8/82	8/18/82
	9/1/83	"
	9/1/83	"
	9/1/83	"
	5/25/83	"
	9/1/83	"
	10/8/82	"

CORRECTIVE ACTION REQUEST

CAR No. 2053

Page 7 of 8

Item 4

QA was unable to locate documentation to verify compliance with FSAR 13.2.1.1.16, Diesel Engine Training for Licensed and Non-Licensed Operator, for the following RO/SRO applications.

RO



SRO



- (1) DeLaval Diesel Training Only
- (2) EMD (HPCB) Diesel Training Only
- (3) No documented diesel training

Item 5

- A. Documentation is conflicting with regard to requalification examinations held 8/12/83 for four individuals. The examination LORQT-8304-27 RO#3 was identified on the Training Course Completion Report as graded by McDonald and the examination written by Shelly. Review of the individual's examinations list "Graded By:", "Written By:" and "Examinee:" as different than the entries on the Training Course Completion Report. QA was unable to verify 13.2.2.2.1 (2nd Sentence).
- B. Section 6 of the requalification examination titled Plant System Design, Control, and Instrumentation for G. Lhamon was written and graded by the NRC. No documentation is available to assure compliance with AECM-82/0179 dated 4/21/82 which requires this be a part of the examinations.
- C. Section 3 of the Requalification Examination for M. Dorsett and S. Lewis was written and graded by the NRC. No documentation is available to assure compliance with AECM-82/0179 dated 4/21/82 which requires this be a part of the examinations.

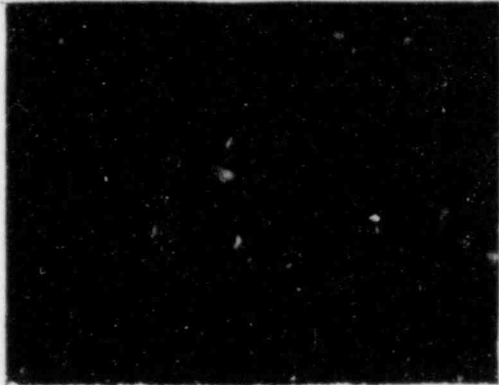
CORRECTIVE ACTION REQUEST

CAR No. 2053

Page 8 of 8

Item 6

No documentation was available to assure compliance with FSAR 13.2.2.1.2 on 1982 annual control manipulations for the following SRO's:



There was no documentation in any training file to indicate that plant equipment and systems were unavailable during 1982 to perform these annual control manipulations.

All of the above SRO's except [redacted] have completed their 1983 annual control manipulations.

[redacted] training file did not contain a Control Manipulations Form, therefore it can not be assured that he has met FSAR 13.2.2.1.2 requirements for annual control manipulations.

ACTIONS REQUIRED:

A written response is required to this CAR in conjunction with the date of completion of the OIEC board for the current recertification process (February 15, 1984). Your response must include a determination of the cause, remedial action taken, and measures taken to preclude recurrence.

William C. Ely 12/19/83
Initiator /Date

Steve Lull 12-21-83
Nuclear Site QA Manager /Date

E. L. T. 12/31/83
Training Supt. /Date



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

Hutchinson

February 29, 1984

Mississippi Power and Light Company
ATTN: Mr. J. B. Richard
Senior Vice President, Nuclear
P. O. Box 1640
Jackson, MS 39205

Gentlemen:

SUBJECT: CONFIRMATION OF ACTION - DOCKET NO. 50-416

This letter refers to the telephone conversation on February 28, 1984, between Mr. A. F. Gibson of this office and Mr. C. R. Hutchinson, Acting Plant Manager, Grand Gulf Nuclear Station, concerning the results of the licensed operator and senior operator NRC requalification examinations conducted at the Grand Gulf Nuclear Station on February 13 - 24, 1984.

Based upon the matters discussed, it is our understanding that the following actions have been or will be taken:

1. The three operators who failed the NRC requalification examinations administered on February 13 - 24, and the three licensed operators who did not take these examinations, have been removed from licensed duties and will not be returned until they have satisfactorily completed an NRC administered requalification examination. These six individuals are identified in enclosure 1.
2. You will provide to this office by March 15, 1984, in writing, your proposed schedule for completion of the GGNS Licensed Operator's Knowledge Verification Program or remedial training, as appropriate, for these six individuals.

If your understanding of our discussion is different from that stated above, please inform this office promptly.

Sincerely,

James P. O'Reilly
Regional Administrator

CAL 50-416-8401

Enclosure:
List of Operators

cc w/enclosure:
J. Cross, Plant Manager

B12
BA
BF

8404060243
2 PP.

B12

Enclosure

<u>Name</u>	<u>Docket No.</u>	<u>License No.</u>	<u>NRC Requalification Exam Simulator</u>	<u>Plant Oral</u>
[REDACTED]	55-8175	OP-5854	Fail	Pass
[REDACTED]	55-8764	OP-6121	Fail	Pass
[REDACTED]	55-8176	SOP-4216	Fail	Pass
[REDACTED]	55-8171	OP-6241	*	*
[REDACTED]	44-7356	SOP-4506	*	*
[REDACTED]	55-8178	SOP-4217	*	*

* NRC Requalification Examination not administered due to individual's present lack of completion on the GGNS Licensed Operator's Knowledge Verification Program.