

Omaha Public Power District
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September 19, 1988
LIC-88-828

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

References: 1. Docket No. 50-285
2. Letter from NRC (R. D. Martin) to OPPD (K. J. Morris)
dated July 29, 1988

Gentlemen:

SUBJECT: OPPD Response to Recent NRC SALP on Fort Calhoun Station
(50-285/88-14)

The Omaha Public Power District (OPPD) has carefully reviewed the most recent SALP Report on Fort Calhoun Station, including discussions at the public meeting on August 19, 1988. We believe the above meeting was valuable and we appreciate the insight gained during the meeting. At that meeting, OPPD provided corrective actions for both the primary and secondary issues.

This letter serves to not only address OPPD's plans in those areas rated a "3", but to also provide our overall plan for improving performance in the other SALP categories.

In summary, OPPD is committed to improving performance. If you have any questions concerning this matter, please do not hesitate to contact me.

Sincerely,

W. Gary Bates

for K. J. Morris
Division Manager
Nuclear Operations

KJM/mc

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Enclosure

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A. Operations

Recommended Licensee Actions

Licensee management needs to develop an attitude that demonstrates, in response to an event, that they are concerned with safe plant operation and that they are willing to take a conservative approach. Inherent with the development of a conservative approach to safe operation of the plant, management should also develop and implement a philosophy that addresses the need to make an operability determination as soon as possible after a component or equipment has been identified as deficient.

Licensee management should increase their efforts to ensure that the operations staff receives the necessary support to ensure that the plant is operated in a safe manner. The licensee should take whatever steps are necessary to ensure that the shift supervisors have the appropriate level of authority to fully implement their assigned responsibilities. Actions should be taken to place significant emphasis on the recommendations made by the shift supervisor with respect to the safe operation of the plant following an event.

OPPD's Response

OPPD has taken, or is planning the following actions in the operations area:

1. On June 24, 1988 OPPD held a nuclear business meeting, attended by nuclear managers and supervisors, to stress the importance of providing an increased emphasis on nuclear safety. Subsequent to this, discussions were held with other nuclear personnel to review information discussed at the meeting. It is believed that this action has increased the sensitivity toward nuclear safety and has emphasized the importance of working toward this common goal. The Plant Review Committee (PRC) has placed increased emphasis on items which could affect nuclear safety and has shifted some management items previously discussed in PRC meetings to staff meeting agenda items. Continued adjustments in the shifting of agenda items not directly related to nuclear safety is being considered.
2. The emergency plan implementing procedures have been revised to provide additional guidance to the operating crews for accident classifications involving certain common mode failures. Emergency plan implementation is now required for such events as loss of raw water, loss of component cooling water, and loss of instrument air. Additional guidance is given to the Site Director to classify an event based upon the loss of a single auxiliary support system which affects a safety system such that it is incapable of operating independently.
3. In an effort to ensure that personnel know the authority and responsibilities associated with the shift supervisors, a memorandum has been distributed. This memorandum from the Manager-Fort Calhoun Station emphasized the Shift Supervisor's role as the Plant Manager's representative and gives guidance concerning Shift Supervisor authority. This memorandum will be reviewed annually and redistributed to reemphasize this important management responsibility.

A. Operations (Continued)

4. Periodic meetings between the plant manager, operations supervisor, and shift supervisors have been and will continue to be held in an additional effort to ensure proper levels of operational support for the shift supervisors and operations staff. Further means of soliciting and responding to operator comments is underway. This program should be in place by October 30, 1988.
5. The pool of licensed operating and staff members is an area where improvement is expected. The authorized staffing level of shift operations personnel has been increased from 50 to 62 equipment operator and control room positions. It is expected that the filling of these positions will begin shortly. Increased staff authorizations will allow additional flexibility in terms of Fort Calhoun's ability to increase both the frequency and size of future license classes.
6. Control room access is another area where improvement has been seen and further improvement following the 1988 refueling outage is expected. Control room modifications performed during the outage will allow the Shift Supervisor's office to be moved nearer to the control room entrance. Support groups will not be allowed to enter the "at the controls" area without a specific need to be in the area.

It is believed that these actions will serve to improve the overall performance in the area of Operations.

B. Radiological Controls

Recommended Licensee Actions

The radiation improvement program should be finalized with major milestones identified and completion dates established. Management/supervision should ensure that the radiation controls are being properly implemented. The training/retraining program should be fully implemented to ensure personnel have a good understanding of regulatory requirements and plant procedures.

OPPD's Response

The following actions are being taken to improve OPPD's performance in the area of radiological controls:

- I. Management oversight and support has been strengthened:
 - A. A new supervisor - Radiation Protection has been designated with over 20 years of industry experience.
 - B. Regular meetings are held between the Supervisor - Radiation Protection and the Plant Manager in order to ensure adequate support is provided for the program. Monthly meetings are held with the Manager - Fort Calhoun Station, Supervisor - Operations, Supervisor - Maintenance and the Supervisor - Radiation Protection to ensure key departmental support and understanding of program needs.
 - C. As a result of recent appraisals, the Radiation Protection organization is being reorganized in order to increase supervisory involvement and technical depth to:
 1. improve attention to detail
 2. improve problem identification and implement effective corrective actions, and
 3. establish clear functional job descriptions and clarify training and qualification requirements for each position.
- II. Radiation Improvement Plan (RIP)
 - A. Responsibility and management oversight for the RIP has been transferred to the Fort Calhoun Station staff. In addition the RIP will be incorporated into a larger scale enhancement program described in II.B. below.
 - B. A project team has been contracted to accomplish the following:
 1. Accelerate the schedule proposed in the original RIP to ensure long term program improvements are complete no later than September 1989,

B. Radiological Controls (continued)

2. Upgrade procedures as required to ensure excellence in Radiological Controls,
 3. Provide technical assistance during the upcoming outage to ensure program adequacy is maintained, and
 4. Provide an assessment and audit function to ensure proper implementation and effectiveness of the RIP as it is phased in during the next 12 months.
- C. Sixteen new positions have been approved in order to increase staff at both the supervisory and technician level.

III. Outage Preparation

- A. Action has been taken to ensure quality HP technicians are available for the 1988 refueling outage.
- B. Radiation protection will provide additional support for maintenance decontamination by using a contractor to maintain cleanliness of containment during the outage.
- C. Key procedures have been identified, and will be upgraded prior to the outage. They include bioassay, air sampling, radiation and contamination survey requirements, personnel contamination, MPC hour tracking, and control of contaminated equipment.
- D. Experienced contractor radiation protection supervisors are being used to support and supplement the OPPD staff during the outage.
- E. Additional radiation protection equipment has been ordered to ensure adequate survey equipment is available, including 20 new ion chambers, six AMS-3s, and a number of air sample devices.
- F. An additional whole body counter has been obtained and is on site for personnel processing and to provide additional support for the outage.

C. Maintenance

Recommended Licensee Actions

Licensee management should increase their involvement in this functional area to ensure that performance in this area returns to its previous high level. Management should continue to reduce the quantity of the maintenance order backlog. Programmatic controls for vendor/technical manual should be established, and upgrading of the content of maintenance procedures should be actively pursued.

OPPD's Response

The Omaha Public Power District has taken steps to improve the area of maintenance at Fort Calhoun Station. These programs are underway and will address many areas beyond what were described as items of concern in the SALP report.

An upgrade of maintenance, calibration, and surveillance test procedures has been contracted to assure information needed to assure verbatim compliance has been included. Members of each procedure's users' group are reviewing these procedures to ensure that the data is accurate before the procedure changes are sent to Plant Review Committee (PRC) for review.

Plant management and supervisory staff are firmly establishing the importance of verbatim procedural compliance; an attitude of verbatim compliance is being promoted at the station. This has been expressed in memos and meetings with station personnel which outlined management's expectations on verbatim compliance. The Supervisor-Maintenance addressed the maintenance staff on September 1, 1988, concerning actions to be taken by the maintenance department to improve procedure compliance. These actions include:

1. Increasing the visibility of violators by including names on incident reports. Procedural compliance is included as an evaluation criterion on performance appraisals. Disciplinary action is invoked when needed for procedural noncompliance. This began September 1, 1988.
2. Revising procedures for human factors as part of the Procedures Upgrade Project, biennial review process and the interim upgrade of refueling outage procedures. These items are in progress at this time.
3. Training individuals on procedure use by 1) creating visual aids for use of the maintenance order form, 2) training craftsmen on the applicable station standing orders (in progress at this time for station and central maintenance personnel), and 3) by development of a craftsmen's handbook (will be complete by September 24, 1988).
4. Performing an abbreviated root cause analysis on each incident report generated from an event after September 1, 1988. The foreman of the person in noncompliance will attempt to discern the cause of the non-compliance and provide guidance to ensure that it does not recur. This began September 1, 1988.

C. Maintenance (Continued)

5. Dedicating a major portion of first line maintenance supervisors' time to field supervision to reinforce station policies and procedures. This is explicit in these position descriptions. Establishing a maintenance department policy of reviewing each completed maintenance order within two working days, with Supervisor-Maintenance review completed within 10 days. This began September 1, 1988.
6. Conducting pre-job briefings to review scope, procedures, safety, house-keeping, and quality control issues on key maintenance activities. This requirement will be formally incorporated into Standing Order G-17, Maintenance Orders, by January 1, 1989.
7. The Project 1991 Procedure Upgrade Project will include provisions for the performance of post maintenance testing in the process of returning equipment to service for all safety related equipment. This process is expected to be complete by December 31, 1991. In the interim, the maintenance planners will establish a planning guide. This guide will include post maintenance testing of equipment as appropriate to prove operability. This guide will be completed by November 1, 1988.

D. Surveillance Test Program

Recommended Licensee Actions

Licensee management should take actions to ensure timely scheduling and completion of surveillance tests, personnel compliance with the surveillance instructions, and correction of the negative trends identified in this functional area. Licensee management should also increase their involvement and oversight to ensure that completed test records are promptly reviewed and dispositioned. Management should also take the actions necessary to ensure that the changes made by amendments to the Technical Specifications are promptly implemented into the appropriate documentation.

OPPD's Response

Management has taken the following steps to strengthen the Surveillance Test (ST) schedule program controls and ensure personnel compliance with Surveillance Test program procedures:

1. Assigned ST program control to the Special Services Department and appointed a new Scheduling Coordinator.
2. Assigned the newly-formed Station Engineering section to assist in ST program upgrade; review procedure changes for impact on scheduling; and review and trend ST results in a timely manner. Additionally, Station Engineering will provide guidance on maintenance or improvements to systems and components based on the results of the trend analysis.

The computer system/program being used for ST tracking is being upgraded to incorporate scheduling and completion tracking into a single program. The program will make allowances for refueling outage and plant mode changes (e.g., forced shutdowns) as needed. The scope and content of the Surveillance Test Computer Program is being developed and a schedule for implementation will be available by November 1, 1988. An exception report capability will be included to generate an overdue/delinquent ST report and will also include the area of "delinquent in being filed." Status reports on current Surveillance Tests will be generated to prompt timely review of completed test results. To provide a better understanding of ST requirements, additional information will be included on the schedule. Examples include support crafts, test frequency, title, and Technical Specification allowable extension date.

The following interim measures have been taken to ensure compliance with the current ST program and prevent missed or delinquent tests:

1. Monthly STs that have no grace period are being manually scheduled. They are identified in the daily task planning schedule to remind appropriate personnel that these tests must be performed as scheduled.
2. A Facility License Change (FLC) has been submitted to the NRC for an amendment to the Technical Specifications for a 25 percent extension (grace period) for ST intervals not presently covered by an extension.

D. Surveillance (Continued)

3. Testing frequencies as stated in the Technical Specifications will be defined to preclude misinterpretation. These definitions will be included in the FLC.

A program will be implemented by November 1, 1988 which will provide added assurance of timely reviews of completed STs by the appropriate supervisors. This is intended to ensure that the adequacy of the test to accomplish its intended purpose receives a timely review by management.

The receipt of amendments to Technical Specifications is followed by issuance of an internal tracking document to assure training and procedure changes are accomplished, and to assure the control room is aware of the amendment.

E. Fire Protection

Recommended Licensee Actions

The licensee should dedicate a qualified individual to perform only fire protection duties, and resolve NRC identified concerns in a timely manner.

OPPD's Response

The following actions have been taken to improve the fire protection area:

1. Effective July 15, 1988 a dedicated fire protection engineering position was established and staffed within the Systems Engineering organization. The engineer's primary focus has been the increased daily attention to active and passive fire protection system operability and maintenance.
2. Upgrades have been completed for several maintenance procedures, and system deficiencies which have been identified are being corrected promptly.
3. A fire door/hardware replacement and standardization program, and a corresponding preventive maintenance program, have been initiated.
4. An action plan is being developed to evaluate the effect on tendon grease on the rating of silicon foam penetration seals.
5. Additionally, increased attention and responsiveness is being given to recently-issued NRC Information Notices pertaining to fire protection and their applicability to Fort Calhoun Station.

Additional future actions planned are:

1. A new administrative procedure will be established which will control and maintain the status of the fire protection system. This procedure is scheduled to be issued by January 15, 1989. The procedure will establish responsibilities for documentation, communication and resolution of system deficiencies, ensure communication and resolution of system deficiencies, and ensure adherence to the requirements of fire protection technical specifications.
2. Assignment of additional fire protection personnel within the System Engineering and Design Engineering Departments is being pursued. These positions will further assure that fire protection related activities are initiated on a timely basis and that fire protection improvements are implemented.
3. The engineer previously assigned to the Fort Calhoun Station Plant Engineering Group has been reassigned to the Design Engineering Department to strengthen fire protection aspects of modifications through his direct input into the design, procurement, installation, and testing of modifications related to the fire protection system.

F. Emergency Planning

Recommended Licensee Actions

The level of management attention to the implementation of the emergency preparedness program should be increased to ensure effective response to NRC identified items.

Licensee management needs to ensure that emergency preparedness training and the verification of the proficiency of emergency response personnel are adequate. In addition, the licensee needs to review and correct emergency implementing procedures and to ensure that exercise scenarios provide the necessary realism during the annual exercise.

OPPD's Response

OPPD has taken the following actions as positive steps toward a heightened level of management awareness in emergency preparedness.

1. The level of management attention to the implementation of the emergency preparedness program is being increased by Emergency Preparedness staff attendance at Plant Review Committee (PRC) meetings. Resolution of emergency preparedness and planning concerns have been completed in a timely manner.
2. In 1987 the Emergency Preparedness organization was reorganized under one manager and the staff was increased by three persons. At present, the group has one manager, with three onsite planners and two offsite planners. In accordance with the Independent Nuclear Appraisal, the Emergency Preparedness Program will be increased by three additional positions.
3. Emergency Planning training will be upgraded to a performance-based program.
4. The Emergency Plan and the corresponding implementing procedures will be evaluated and upgraded to ensure correctness, continuity and compatibility within the full planning program.

To ensure that emergency preparedness training and the verification of the proficiency of emergency response personnel are adequate, OPPD has taken the following actions.

1. Committed to evaluating and upgrading the emergency response training program to a performance-based training program by June 30, 1990.
2. Non-Emergency Preparedness training such as Technical Staff, First-Aid, and Respiratory Protection training will be outlined for each individual position in the Emergency Preparedness Training Manual. Training will be coordinated through the annual training schedule matrix.
3. More small scale drills emphasizing damage control and radiological controls will be performed within the annual training schedule. Additional small scale drills will emphasize augmentation, notification, and accountability methods.

F. Emergency Planning (Continued)

4. Attendance at 1988 Emergency Preparedness training has been much improved over the previous year. The emergency preparedness staff will continue to develop annual training schedules, provide them to members and supervisors of the emergency response organization, and strive to eliminate absences or postponement of scheduled training.

To address concerns with the emergency implementing procedures, OPPD has:

1. Developed a data base that cross references emergency implementing procedures to other applicable procedures so that affected procedures can be identified and changed at the same time.
2. The Radiological Emergency Response Plan (RERP) and the Emergency Plan Implementing Procedures (EPIP) will be evaluated and revised for human factors, technical content, and compliance with 10 CFR 50, NUREG and INPO Good Emergency Preparedness Practices. These procedures will be developed in accordance with the procedures writers guide and targeted for completion by June 30, 1990. The procedure revisions and format will be coordinated closely with the Project 1991 and Radiation Protection Improvement Program to ensure continuity.

The following actions will ensure that OPPD exercise scenarios provide the necessary realism during the annual exercise:

1. The 1988 scenario was run on the CE simulator, which helped to identify weaknesses in operational data. The data provided by the simulator was used to correct those weaknesses prior to running the exercise. In addition, three contractor representatives assisted with preparation of the radiological data and operational actions. Their software was utilized to calculate compartmentalized radioactive material data from the release point to offsite positions. Because the CE simulator is not identical to Fort Calhoun, some discrepancies were not identified until the exercise. OPPD will continue to use a simulator to test exercise scenarios as an independent review. The OPPD simulator will be used after it is installed and operational.
2. OPPD will continue to use contractor assistance, especially for the preparation of radiological and operational data.
3. The 1989 Scenario Development Group has been assigned approximately nine months before the annual exercise. This longer preparation time will allow improved development and review of the scenario for greater realism. One person of this group is designated to coordinate the project.
4. Emergency Preparedness Test EPT-10, which procedurally controls scenario development, will be reviewed and upgraded, as needed, by January 31, 1989.

G. SECURITY

Recommended Licensee Actions

The licensee is encouraged to focus on long-term corrective actions to ensure that repeat violations do not recur and complete the security program improvements in progress.

OPPD's Response

OPPD concurs with the importance of long-term corrective action. To assure continued improvement in this area:

1. Industry experts have been retained to do a comprehensive study of Security functions at Fort Calhoun Station. The review will provide an independent, in-depth assessment of the nuclear security program and develop recommendations. This review is scheduled to be completed by October 28, 1988 and reports submitted immediately thereafter. Review of the assessment and recommendations will be completed in January 1989 and a plan of action will be formulated and published no later than February 1989.
2. Security Organization and staffing levels have been reviewed. A new security organization has been approved. The new organization includes additional positions and increased staffing levels. Contractor personnel are being used to supplement the security staff. Corrective actions are being implemented on several of the recommendations from the reviews. An overall security improvement plan is being developed. Additional experienced nuclear security supervision and security officers are being provided by a contractor to support the OPPD security force for the 1988 refueling outage.
3. Supervisory personnel have been selected and appointed to Security Shift Supervisor positions and recruitment is underway to fill the remaining positions.
4. The current Manager and Supervisor, Security Services have visited other nuclear utilities and periodic visits are scheduled for the coming year to selected utilities which have demonstrated excellent security programs.
5. Revision of the Security Training and Qualification and Lesson Plans is in progress and recruitment of a Security Training Specialist is underway. Further review of the Training program to determine additional revisions and upgrading necessary for excellence is currently being conducted by retained industry experts. The findings will be compared against a model training program based on those in use at other highly rated power plants. Security personnel are aware of the impact of the new Security system and are working with OPPD project engineers to track the progress of the system contracts and assure the system meets Security requirements.
6. The security procedures upgrade effort has been in progress since February 1988 and completion of Security related documents are scheduled for submittal to the NRC by January 1989.

H. Outage-Related Activities

Recommended Licensee Actions

Licensee management attention should be increased for activities associated with special process control to ensure that these activities are performed in accordance with requirements. The licensee should provide better oversight of outage activities to ensure that the operations staff is continually informed of outage activities that could affect plant systems.

OPPD's Response

In order to improve our performance in the outage activities area;

1. OPPD has assigned a full time outage manager (Supervisor - Outage Projects) who will be responsible only for the direction and coordination of outage-related activities and work groups.
2. The total outage management organization, in addition to the Supervisor - Outage Projects, will consist of management level personnel from all support departments. These personnel will meet daily to review the outage work and schedules, monitor work in progress, and provide oversight and coordination of upcoming activities.
3. Work identified for the 1988 outage has been pre-planned as much as possible and will be accomplished in accordance with written procedures (reviewed and revised by Project 1991 personnel) and a defined schedule.
4. The outage schedule is utilizing the system window concept in which all work associated with a system or subsystem is accomplished within a single time frame. Close adherence to this schedule will assure that redundant components are maintained in an operable status in accordance with Fort Calhoun Station Technical Specifications while assuring that operations and management are aware of components out of service.
5. During the planning process of steam generator maintenance, a decision to acquire a long term (3 outage) contract was made. This contract was awarded to Combustion Engineering, the steam generator manufacturer, and will include all steam generator maintenance on the primary and secondary sides. This will assure adequate experience and reduce the difficulties experienced in past outages.
6. Since the 1987 refueling outage, the welding control program has been completely revised under the auspices of a full time welding specialist.

I. Quality Programs and Administrative Controls Affecting Quality

Recommended Licensee Actions

Licensee management should ensure that plant events are reviewed and that an effective corrective action program is implemented. Management involvement in the area of commitment tracking should be increased to provide a tracking system that will ensure that commitments made to the NRC are timely and accurately completed. Management should take action to ensure that the analyses performed by the technical staff to address operability of plant components and equipment provide an in-depth description of the basis for the conclusions provided by the analyses.

OPPD's Response

Management has taken the following steps to increase the level of review of plant and operational events:

1. A Safety Review Group (SRG) is being formed which will be tasked with independently assessing the nuclear safety aspects of plant events. The Management Investigative Safety Team (MIST) concept will be continued until the SRG is staffed with qualified personnel.
2. The membership of the Plant Review Committee has been reorganized to include the Manager - Nuclear Safety Review, the Manager - Quality Assurance & Quality Control, the Manager - Training, and the Supervisor - Systems Engineering. In addition to key plant personnel. This has strengthened the committee's safety perspective.
3. The Safety Audit and Review Committee (SARC) has been restructured to increase its focus on safety and to include outside consultants with a broad experience base in the nuclear power industry. The SARC will also meet more frequently.
4. Measures to improve the corrective action system include the development of a root cause analysis program and increasing the sense of urgency in addressing and resolving quality assurance program implementation deficiencies.
5. The QA organization plans improvements in its audit and surveillance programs to better address human performance problems; deficiencies in implementation of corporate and station policies and procedures; and program effectiveness.
6. The computerized commitment tracking system is being developed and is scheduled to be operational this year. The software has been developed. Current commitment information is being entered into the system.
7. A System Engineering group at Fort Calhoun will improve OPPD's engineering and technical support capability. Properly trained and qualified system engineers, in conjunction with improved procedures and guidance, will improve the scope, depth, and accuracy of analyses performed by the

I. Quality Programs and Administrative Controls Affecting Quality
(Continued)

technical staff. New safety analyses for operability or continued operation will be independently evaluated by the QA organization until the Safety Review Group (SRG) is properly staffed.

8. Operations review comments are very important to OPPD. An informal mechanism for ensuring operations review comments are appropriately resolved has been implemented. A formal operations feedback program will be implemented, as noted in Section A, by October 30, 1988.

J. Licensing Activities

Recommended Licensee Actions

The licensee should continue with established programs for reconstitution of the design and evaluation of staffing and management. Technical reviews must be conducted in a more detailed manner and documented such that an independent review can be successfully accomplished.

OPPD's Response

OPPD is firmly committed to "Excellence" in the area of Licensing activities. OPPD will increase emphasis on licensing activities in order to regain the previous "1" performance rating. The licensing area is one which requires support from many areas of OPPD in order to achieve a number 1 rating.

The following actions have been taken to improve the area of licensing activities.

1. Corporate emphasis on safety first and operations second has been stressed to all exempt (salaried) personnel. Efforts are underway to ensure personnel receive the same message.
2. The reporting level of the person (Manager - NL&IA) in charge of licensing has been elevated, and now reports directly to a Division Manager.
3. The authorized staffing level in the Licensing area has been increased. Efforts are underway to fill the new positions.
4. Additional emphasis has been placed on holding individuals who provide information to Licensing accountable for the contents of detailed technical submittals to the NRC.
5. Approval has been given to hire experienced nuclear personnel in a variety of disciplines in order to supplement existing technical skills and knowledge.
6. A corporate planning group, reporting directly to the Senior Vice President, has been established to consolidate planning and coordinate resource loading activities, providing realistic scheduling.
7. Reorganization efforts included creation of a Nuclear Safety Review group which will emphasize the quality of reviews of events and determine root causes.

Efforts and emphasis will continue in the following areas:

1. Design basis reconstitution will continue on the schedule coordinated with the NRC.
2. Timeliness and quality of submittals will be emphasized.

J. Licensing Activities (Continued)

3. Licensing review will continue to perform in-depth reviews of documents to be transmitted to the NRC.
4. Staffing open positions with experienced personnel will be emphasized.
5. Quality of independent review of submittals to the NRC will be stressed.
6. A variety of management training is planned to increase individual skills.

These improvements, along with past successful efforts, will help OPPD achieve its previous rating of "1" in the area of licensing activities.

K. Training and Qualification Effectiveness

Recommended Licensee Actions

The licensee should implement a study or assessment to identify the root cause of the continued poor performance in this functional area and establish prompt corrective action. The assessment might best be accomplished by an organization and its immediate management. Management should take prompt and effective corrective action to correct the root causes identified by the assessment. Management should also establish a means to monitor the performance in this area to ensure that any future defect in performance can be promptly identified and corrected.

OPPD's Response

OPPD is firmly committed to continue to improve our performance in the area of training and qualification effectiveness. The following described actions taken and planned in this area.

1. OPPD recognizes that significant weaknesses existed in our licensed operator requalification process following the failure of the three (3) SRO's in the November 1986 MRC requalification examinations. OPPD conducted both an internal and an independent assessment by General Physics of the licensed operator requalification process in January 1987. Results of this independent assessment were reported directly to the Senior Vice President. An action plan was developed and implemented which was directly monitored by the Senior Vice President.
2. A follow-up audit of this action plan was completed in January 1988 and indicated that the plan had been successfully implemented. The results of this audit were also reported directly to the Senior Vice President.
3. The training program was audited as part of the Independent Nuclear Appraisal.

OPPD believes that progress in training and qualification has been demonstrated through the recent inspection of licensed operator training, the results of the pilot requalification examinations, the fact that the violation and four of the five open items from the latest inspection have been closed and the success of all five candidates in our most recent initial examinations.

OPPD believes that weaknesses in the licensed operator training programs may be due to weakness in the management of operator training, inadequate monitoring of training performance, continued reliance on contractor supplied personnel, and lack of depth in understanding of the training process. To address these items and the evaluations, conclusions and recommendations of the SALP, OPPD has or will take the following actions:

K. Training and Qualification Effectiveness (Continued)

1. Conduct an independent assessment of the training area. This assessment will concentrate on the management of the training programs. This assessment is being conducted under the auspices of the Quality and Environmental Affairs Division. The assessment of the licensed operator training programs has been initiated and will be completed by September 30, 1988. The assessment of nonlicensed training will be completed by November 11, 1988. Prompt and effective corrective action based on the results of these assessments will be taken by management.
2. Strengthen the management of operator training by retaining an experienced manager with nuclear training experience to serve as an assistant to the Supervisor - Operations and Technical Training.
3. Strengthen the overall management of training. A Manager - Training position reporting to the Division Manager - Nuclear Operations was established on July 1, 1988.
4. To allow the Supervisor - Operations and Technical Training to concentrate on operator training, the technical training area (STA, technical staff, engineering and management) is temporarily reporting directly to the Manager - Training. This reporting relationship will continue until the Operations training area has been strengthened.
5. Authorization has been given to hire an Assistant Manager - Training to strengthen management of the training process.
6. A method to monitor the effectiveness of training will be developed by November 30, 1988 and implemented by January 1, 1989, as discussed in the OPPD responses to the Independent Nuclear Appraisal.
7. A minimum of one Fort Calhoun Senior Reactor Operator will be transferred to Training by December 31, 1988, and requisitions have been approved to hire additional operations training instructors to reduce our reliance on contractor-supplied personnel.
8. To strengthen the depth of the understanding of the training process, a course on performance-based training will be taught by Robert Mager for ten members of Training in October 1988.

OPPD believes that these actions will significantly improve our performance in the training and qualification effectiveness area.