

DMB

APR 18 1986

Docket No. 50-341

The Detroit Edison Company
ATTN: Frank E. Agosti
Vice President
Nuclear Operations
6400 North Dixie Highway
Newport, MI 48166

Gentlemen:

As you may be aware, the NRC has recently revised the NRC Manual Chapter relating to the Systematic Assessment of Licensee Performance (SALP) Program. In order that you and your staff may be kept informed of the changes to our program, I am taking this opportunity to highlight the areas most significantly affected by the latest revision:

- Training and Qualification Effectiveness has been added as a new functional area and will include all activities relating to the effectiveness of training for both licensed and non-licensed personnel. Ratings in this area will be based on those training programs covered by the enclosed Commission Policy Statement on Training and Qualification dated December 14, 1984.
- The "Refueling" functional area has now been retitled "Outages" and will encompass plant operations and licensed activities associated with major outages, including outage management, major plant modifications, repairs or restoration of major components, post-outage startup testing of systems prior to return to service, as well as refueling activities.
- The requirement to address a trend for each functional area has been deleted. As you are aware, this item has, in the past, resulted in some confusion in the way it was applied. A trend will be included, however, as a SALP Board comment, if it is clearly discernible to the Board and if a change in performance level may result if the trend continues. Should trend be used, it will reflect a licensee's performance near the close of the assessment period. In this case, the evaluation process will be used to focus NRC and licensee attention on an area because of a decline in performance or to credit performance because of an improving trend.

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We hope you find this information worthwhile. If you have any questions, please contact Mr. Jack Hind of my staff on 312 790-5510.

Sincerely,

for Jack Hind
James G. Keppler
Regional Administrator

Enclosure: As stated

- cc w/enclosure:
- L. P. Bregni, Licensing Engineer
- P. A. Marquardt, Corporate Legal Department
- DCS/RSB (RIDS)
- Licensing Fee Management Branch
- Resident Inspector, RIII
- Ronald Callen, Michigan Public Service Commission
- Harry H. Voigt, Esq.
- Nuclear Facilities and Environmental Monitoring Section
- Monroe County Office of Civil Preparedness

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NUCLEAR REGULATORY COMMISSION

COMMISSION POLICY STATEMENT ON TRAINING AND QUALIFICATION

OF NUCLEAR POWER PLANT PERSONNEL

AGENCY: Nuclear Regulatory Commission

ACTION: Final Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel

SUMMARY: This statement presents the policy of the Nuclear Regulatory Commission (NRC) with respect to training and personnel qualification and describes the activities that the NRC will use to execute its responsibilities to ensure the health and safety of the public. This Policy Statement provides regulatory guidance called for by the Nuclear Waste Policy Act (P.L. 97-425) which directed the NRC to promulgate regulations or other regulatory guidance for the training and qualifications of civilian nuclear power plant operators, supervisors, technicians and other appropriate operating personnel. In recognition of industry initiatives underway to upgrade training programs, the NRC endorses the Institute of Nuclear Power Operations (INPO)-

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managed Training Accreditation Program in that it encompasses the elements of performance-based training and will provide the basis to ensure that personnel have qualifications commensurate with the performance requirements of their jobs. It remains the continuing responsibility of the NRC to independently evaluate applicants' and licensees' implementation of improvement programs to ensure that desired results are achieved. Nothing in this Policy Statement shall limit the authority or responsibility of the NRC to follow up on operational events or place any limit on NRC's enforcement authority when regulatory requirements are not met. However, while evaluating the effectiveness of this guidance in lieu of a new training regulation, the NRC intends to exercise some discretion in enforcement matters related to training and qualification of nuclear plant personnel and refrain from new rulemaking in this area for a period of at least two years from the effective date of this Policy Statement.

EFFECTIVE DATE: (Upon publication in the Federal Register)

FOR FURTHER INFORMATION CONTACT: Hugh L. Thompson, Jr., Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, telephone (301) 492-9595.

SUPPLEMENTARY INFORMATION:

BACKGROUND

The Nuclear Waste Policy Act (P.L. 97-425), Section 306, directed the Nuclear Regulatory Commission (NRC) to promulgate regulations or other regulatory guidance for the training and qualifications of civilian nuclear power plant operators, supervisors, technicians and other appropriate operating personnel (including instructional requirements, simulator training requirements, and requirements for requalification examinations and operating tests). This Policy Statement is responsive to the mandate of the Nuclear Waste Policy Act for regulatory guidance on training and qualifications for nuclear power plant personnel. Regulations or regulatory guidance in the remaining areas are being developed separately.

Following the accident at TMI-2, the NRC has emphasized the need to upgrade training and qualifications of nuclear power plant personnel. In the TMI Action Plan, NUREG-0660, 1980, the NRC cited its ongoing study of accreditation of training as a possible means of upgrading training programs in the industry. Since that time, INPO has developed a training accreditation program which the NRC has found to be an acceptable means of industry self-improvement in training. The NRC has, therefore, made INPO accreditation the focus of the policy set forth here for training, allowing the industry a minimum of two years of accreditation activity without the introduction of new NRC training regulations.

The following statement sets forth the policy of the NRC with respect to training and qualification and describes the activities that the NRC will use to execute its responsibilities to ensure the health and safety of the public.

POLICY STATEMENT

The Commission recognizes that the industry, through the initiatives of the Nuclear Utility Management and Human Resources Committee (NUMARC) and the Institute of Nuclear Power Operations (INPO), has made progress in developing programs to improve nuclear utility training and personnel qualification. While some of these efforts have only recently been initiated, the Commission realizes the importance of industry's initiative and wishes to encourage further self-improvement. Subject to the continued success of INPO programs and NRC's ability to monitor their effectiveness, the Commission will refrain from new rulemaking in the area of training for a minimum period of two years from the effective date of this Policy Statement. While the Commission is deferring rulemaking in this area in recognition of the industry efforts to date, the NRC can only exercise this flexibility as long as the industry programs produce the desired results. It remains the continuing responsibility of the NRC to independently evaluate applicants' and licensees' implementation of improvement programs to ensure these results are achieved and to evaluate the possible need for further NRC action based on the success of industry programs after a two-year period.

The following paragraphs present the NRC policy with respect to licensees' and applicants' programs for personnel training and qualification.

The nuclear power industry, through programs being coordinated by the Institute of Nuclear Power Operations (INPO), has made and is making progress toward improving the training of nuclear power plant personnel by accreditation of training programs. The NRC endorses the INPO-managed Training Accreditation Program in that it encompasses the elements of effective performance-based training.

The NRC considers the following five elements as essential to acceptable training programs:

- o systematic analysis of the jobs to be performed
- o learning objectives derived from the analysis which describe desired performance after training
- o training design and implementation based on the learning objectives
- o evaluation of trainee mastery of the objectives during training
- o evaluation and revision of the training based on the performance of trained personnel in the job setting

The NRC recognizes that the INPO-managed accreditation of utility training includes the following training programs:

- o non-licensed operator
- o control room operator
- o senior control room operator/shift supervisor
- o shift technical advisor
- o instrument and control technician
- o electrical maintenance personnel
- o mechanical maintenance personnel
- o radiological protection technician
- o chemistry technicians
- o on-site technical staff and managers

All utilities have committed to achieving accreditation of each of the above training programs. It is understood that each licensee will exert best efforts to have all such programs ready for accreditation (i.e., final self-evaluation report submitted to INPO) by the end of 1986. It is also understood that applicants for operating licenses will exert best efforts to have all such programs ready for accreditation within two years after issuance of a full-power operating license.

For operating reactors, accreditation of the above training programs constitutes a method acceptable to the NRC for implementing performance-based training. The NRC will continue to review and

approve all applicant training programs in accordance with applicable regulations, regulatory guidance, and the Standard Review Plan and to conduct inspections necessary to determine that current regulations and license training commitments are being met. Notwithstanding this policy guidance, regulations in 10 CFR Part 55 regarding licensed operators will continue to be the basis for evaluation of applications for operators' licenses.

It should be noted that training programs for which regulations are currently in place (e.g. fire brigade, emergency response, security) or which are not subject to INPO accreditation (e.g., quality assurance) are not affected by this Policy Statement.

To assure that the nuclear industry's training program improvements are effective, the NRC will continue to closely monitor the process and its results by:

- o recommending a member to serve on each Accrediting Board;
- o having an NRC staff member attend and observe Accrediting Board meetings with the INPO staff and/or the utility representatives;
- o periodically observing accreditation team site visits;
- o accompanying INPO on selected plant evaluations;
- o meeting with INPO to share information on projects and activities;
- o reviewing pertinent accreditation documents;

- o including a training summary evaluation as part of each systematic assessment report of licensee performance (SALP);
- o monitoring plant and industry trends and events involving personnel errors;
- o conducting operator licensing exams;
- o conducting operator requalification exams, consistent with Commission policy;
- o continuing evaluation of industrywide training and qualification program effectiveness; and
- o conducting performance oriented training inspections to assess the level of knowledge of plant personnel.

In addition, INPO will:

- o continue to manage the industry accreditation program;
- o continue to conduct performance-oriented evaluations of training and qualification programs;
- o make generic accreditation documents (program description and criteria) publicly available; and
- o review and consider NRC recommendations regarding training.

Also, the industry, through NUMARC or other appropriate methods, will:

- o brief the Commission periodically on program status; and
- o provide periodic status reports to the NRC staff, including plant accreditation status.

PERSONNEL QUALIFICATIONS

The NRC and the industry recognize that the qualifications of personnel at nuclear power plants should be commensurate with the requirements of the jobs they perform. Since the INPO-managed accreditation and evaluation programs are performance-based, this policy statement assumes that training programs for those positions covered will provide appropriately qualified personnel. For positions outside the scope of the INPO-managed accreditation program, for licensed operators and senior operators, and for all personnel at facilities applying for an operating license, NRC staff will continue to review qualifications in accordance with appropriate regulatory policy guidance.

NRC will use the same general methods described for training above to monitor the industry's progress in improving the qualifications of nuclear power plant personnel.

ENFORCEMENT POLICY

Notwithstanding its Enforcement Policy in 10 CFR Part 2, Appendix C, 49 FR 8583 (March 8, 1984), the Commission will exercise some discretion in selecting appropriate enforcement action for violations involving training in light of the NUMARC/INPO initiative. Licensees who are making reasonable efforts in developing and implementing the INPO/NUMARC programs described above will generally not be cited for violations related to these programs, provided the violations, whether or not identified by NRC, are appropriately corrected in a timely manner. However, violations which are not corrected in a timely manner, violations of any applicable reporting requirement, and any willful violation may be subject to enforcement. Any enforcement action taken during this grace period will be taken only with Commission concurrence. In addition to required reports and inspections, information requests under 10 CFR 50.54(f) may be made and enforcement meetings held to ensure understanding of corrective actions. Orders may be issued where necessary to achieve corrective actions on matters affecting plant safety. In brief, the NRC's decision to use discretion in enforcement in order to recognize industry initiatives in no way changes the NRC's ability to issue orders, call enforcement meetings or suspend licenses when a safety problem is found. Nothing in this Policy Statement shall limit the authority of the NRC to conduct inspections as deemed necessary and to take appropriate enforcement action when regulatory requirements are not met.