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Al Kaplan

VICE PRESIDENT
NUCLEAR GROUP

October 14, 1988
PY-CEI/NRR-0921 L

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Perry Nuclear Power Plant
Docket No. 50-440
Additional Information For Our
Response to Examination Report
50-440/OL-88-01

Gentlemen:

This letter provides additional information for our response (letter PY-CEI/NRR-0884L dated July 14, 1988) to the two program deficiencies identified in the Requalification Examination Report 50-440/OL-88-01 dated June 14, 1988. This supplemental information is provided as requested during discussions with Messrs. D. Hills and M. Jordan of your staff on August 17, 1988.

If there are any further questions, please feel free to call.

Very truly yours,

Al Kaplan
Vice President
Nuclear Group

AK/sc
Attachment

cc: K. Connaughton
T. Colburn
G. Wright - USNRC Region III

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Restatement of Deficiency a:

During development of the examinations, the facility representatives indicated that training is not specifically provided in the licensed operator requalification program on the ability to operate the facility's auxiliary and emergency systems in the plant (i.e. outside the control room) other than the remote shutdown panel. Facility representatives indicated that such operations are performed by non-licensed operators and that these in-plant system operating abilities are, therefore, not included in the licensed operator's job task analysis. This is considered a serious program deficiency per 10 CFR 55.59(a)(ii), 55.45(a) and 55.45(a)(8). It is NRC policy that these tasks be included in the licensed operator's job task analysis and that licensed operators receive training and be evaluated during the requalification program on those tasks with sufficiently high importance ratings.

Restatement of Original Response to Deficiency a:

CEI agrees that improvement is needed in our handling of training licensed operators for tasks outside the control room. The pilot process made it clear that this is an area where the requirements have not been firmly established and where practices differ from plant-to-plant.

Training at Perry is provided to licensed operators on equipment, systems, and tasks outside the control room. The training included systems design details, system and component locations, and system walkdowns including in-plant procedure usage. The evaluation process, both internally by CEI and formally by NRC, has demonstrated that the licensed operators are fully prepared to perform appropriate tasks outside the control room.

Nonetheless, the training and the job analysis need improving. The training was provided without a clear identification of the person who is responsible for performing the task. As a result, the training provided too much detail in some areas and not enough in others. Responsibilities were identified implicitly as a result of the training conducted. The job analysis for licensed operators includes tasks outside the control room but is vague on the level of detail required. In order to improve the training in this area, we intend to identify those tasks outside the control room for which we hold the licensed operator accountable. This identification will be made based upon those off-normal and emergency procedure tasks normally performed by a non-licensed operator. Such tasks which have high time sensitivity and high significance relative to safe shutdown of the plant or mitigation of the consequences of an accident will be incorporated into the job analysis for the licensed operator. These items will be identified with an importance rating of 3.5 or higher which will ensure that training and evaluation occurs as appropriate as part of the requalification program.

Supplemental Response to Deficiency a:

CEI agrees that improvement is needed in our handling of training licensed operators for tasks outside the control room. The pilot process made it clear that this is an area where the requirements have not been firmly established and where practices differ from plant-to-plant.

However, as stated in the original response letter, licensed operators at Perry have received some limited training on outside the control room tasks. These tasks include remote shutdown panel operation, redundant remote shutdown room operation, and special operations required in emergency procedures. Although the special operations training involves valve and lifted lead manipulations, it is classroom training only.

In order to provide training to licensed operators on outside the control room tasks, the following actions will be taken:

1. Current non-licensed operator tasks of significant importance (importance rating ≥ 3.5 utilizing NUREG 1123) will be identified.
2. Normal and emergency procedures will be reviewed to identify tasks which are currently performed by non-licensed operators.
3. An analysis will be performed on the tasks identified in steps 1 and 2 to assign specific importance ratings for Perry.
4. Justification and documentation will be provided for any difference in importance ratings between NUREG 1123 and a Perry specific rating where the Perry rating is lower than 3.5.
5. Identified tasks with a Perry specific importance rating 3.5 or greater will then be incorporated into requalification training.

Restatement of Deficiency b:

During the administration of the simulator portion of the exam, the NRC did not rotate the individuals in the Unit Supervisor and Shift Supervisor positions, because the licensee's requalification program did not rotate individuals in these positions. The NRC finds this practice to be a serious program deficiency. Moving from the Unit Supervisor position to the Shift Supervisor position results in the SS being one step removed from direct involvement in licensed activities. The Unit Supervisor position on the other hand is at the forefront of licensed activities, and from a proficiency and competency standpoint, examining the SS in this position would be more meaningful and would more closely meet the intent of 10 CFR 55.45.

Restatement of Original Response to Deficiency b:

CEI feels that clarification of our existing program is required to resolve the identified concern with rotation of individuals to other positions of responsibility during the simulator portion of the requalification training program.

The License Requalification program was reinitiated at Perry on September 8, 1986. The program was conducted in five-week (or, after January 1, 1988, six-week) periods known as "cycles". During each cycle each licensed operator received one week of training; the training was repeated weekly so that all shift crews could attend. In addition to licensed operators, staff license holders, and recently, some non-licensed personnel (e.g., Shift Technical Advisor [STA]) attended. The sixteenth cycle was completed on June 17, 1988. The Requalification Program consists of training and evaluation (classroom, simulator, and on-the-job). The two paragraphs which follow describe the portion of the training and evaluation process which involved the simulator.

1. Training

Simulator training during the 16 completed cycles was completed 14 times using a three-man crew and twice using a five-man crew. Three-man crews were used to prepare personnel for old style NRC exams; five-man crews were used to make the training more performance-based.

During training sessions using a three-man crew, the positions are Senior Reactor Operator (SRO), Reactor Operator (RO), and Balance Of Plant (BOP). The SRO position encompasses the duties of both the plant Unit Supervisor (US) and the plant Shift Supervisor (SS), with heavy emphasis on the former. Each SRO license holder received training in this SRO position during the 14 cycles of three-man training. In addition, during this training, each SRO was trained in the RO and BOP positions to maintain their manipulative skills.

During training sessions using a five-man crew, the positions are SS, US, RO, BOP, and STA. Training in this configuration was conducted during Cycles 12 and 16. The focus of this team training was performance-based, with each person performing only in their normal plant job position. Hence, the SS trained only in the SS position, and the US performed only in the US position.

2. Evaluation

During the 16 completed cycles, simulator evaluation occurred in three ways: 1.) evaluation following each simulator session; 2.) one cycle was devoted to the annual operating exam (pursuant to 10 CFR 55.50 a2ii), and 3.) one week was devoted to the "pilot" requalification exam. In each instance, operators were evaluated in each of the positions in which they performed.

The annual operating exam was conducted in three-man crews, and the "pilot" requal exam was conducted in five-man crews. During the annual operating exam each SRO was evaluated in both the SRO position and the RO position. During the "pilot" requal exam each person was evaluated only in his normal job position*.

The "pilot" exam was conducted in accordance with the draft guidance in existence at the time which emphasized testing each crew member "appropriate to his/her license".

The only times that plant Shift Supervisors and plant Unit Supervisors did not receive training and evaluation in the opposite SRO plant position were during periods of performance-based, position-specific, training and evaluation. This occurred during Cycles 12 and 16. We hope that this clarifies the concern addressed in paragraph 3b of your letter.

We feel that the best way to maintain crew preparedness is to focus the training and evaluation on the objectives involved. On some occasions, this involves training in small groups on specific components or specific activities. On other occasions, this involves the entire control room team controlling the integrated operation of the plant. This approach has been endorsed by INPC and has proven successful for us.

Supplemental Response to Deficiency b:

In the future, Perry will continue to provide plant Shift Supervisors (SS) and Plant Unit Supervisors (US) training and evaluation in both the SS and US positions.

* (except that accommodations were made for one person who performs in the plant as an RO but who holds an SRO license; to accommodate this person, he was evaluated during the pilot exam as an RO and as a US, and likewise one US was tested both as a US and as a RO).