

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-285/86-24

License: DPR-40

Docket: 50-285

Licensee: Omaha Public Power District
1623 Harney Street
Omaha, NE 68102

Facility Name: Fort Calhoun Station (FCS)

Inspection At: Fort Calhoun Station, Blair, Nebraska

Inspection Conducted: August 25-29, 1986

Inspectors:

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E. A. Plettner, Resident Inspector, (RI)

9/29/86
Date

P. H. Harrell
P. H. Harrell, Senior Resident Inspector (SRI)

9/24/86
Date

Approved:

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Inspection Summary

Inspection Conducted August 25-29, 1986 (Report 50-285/86-24)

Areas Inspected: Routine, unannounced inspection of the licensee's licensed operator and requalification training program.

Results: Within the two areas inspected, four potential violations were identified (failure to maintain adequate training records, paragraph 3.a; failure to perform manipulations on the plant controls, paragraph 3.a; failure to provide preplanned lectures, paragraph 3.c; and failure to provide remedial training, paragraph 3.d). In accordance with Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel (50 FR 11147), these potential violations will be treated as unresolved items.

DETAILS

1. Persons Contacted

- *J. Fisicaro, Supervisor - Nuclear Regulatory & Industry Affairs
- *J. Fluehr, Supervisor - Station Training
- *W. Gates, Plant Manager
- C. Brunnert, Supervisor - Operations Quality Assurance
- L. Kusek, Supervisor - Operations
- *F. Swihel, Training Coordinator
- J. Gass, Supervisor - Training

*Denotes attendance at the exit interview, August 29, 1986.

The NRC inspectors also contacted other plant personnel, including operators, technicians, and administrative personnel.

2. Licensed Operator Initial Training

The NRC inspectors reviewed the initial licensed operator training program to verify that the program being implemented by the licensee complied with the licensee's NRC-approved training program and 10 CFR Part 55. During performance of this review, the NRC inspectors verified that the following program elements were properly implemented by the licensee.

- o Required lectures by the licensee's NRC-approved training program were attended
- o Simulator training center certification of training was completed
- o Required time onshift was performed
- o Records were maintained by the training department to document participation by each licensing candidate in the above activities.

No violations or deviations were identified in this area.

3. Licensed Operator Requalification Program

The NRC inspectors reviewed the licensed operator requalification program to verify that the program being implemented by the licensee complied with the licensee's NRC-approved training program and 10 CFR Part 55. During performance of this review, the NRC inspectors verified that the following program elements were implemented by the licensee.

- o Preplanned lectures required by the licensee's NRC-approved training program were given to the operating staff in each 2-year requalification program.

- ° Documentation was available to indicate that staff supervision personnel (licensed individuals not assigned to an operations crew) reviewed facility design changes, procedure changes, facility license changes, and abnormal and emergency operating procedures.
- ° All licensed individuals who failed the annual written examination were placed in an accelerated requalification program.
- ° All licensed individuals who scored low in any particular category were required to attend appropriate lectures.
- ° All licensed individuals received on-the-job training as specified by the licensee's NRC-approved training program.
- ° Each licensed operator completed an annual requalification examination prepared by the licensee.
- ° Records were maintained by the training department to document participation by each licensed operator in the above activities.

The NRC inspectors also reviewed the training program presently used by the licensee against the training program originally approved by the NRC. This review was performed to verify that revisions made by the licensee to the NRC-approved program had not lessened the requirements of the program. No instances were noted where the program had been degraded.

During review of the licensee's implementation of the NRC-approved training program, the NRC inspectors noted several problems. These problems are discussed below. The program elements, provided in the above listing, not discussed below were reviewed by the NRC inspectors and found to be satisfactory.

a. Training Records

One major concern identified during this inspection was the licensee's inability to produce records to document the participation of each licensed reactor operator (RO) and senior reactor operator (SRO) in the requalification program. The requirements for maintaining requalification program records is stated in Section 5 of Appendix A to 10 CFR Part 55 and in Section 10 of Appendix B to the licensee's training manual. Appendix B of the licensee's training manual contains the licensee's NRC-approved training program. These requirements state that records shall be maintained to document the participation of each licensed operator in the requalification program. Examples of the licensee's failure to maintain requalification training records are provided below. The sample size used in this portion of the inspection was the training records for 12 ROs and 12 SROs, unless otherwise specified. In each example provided below, the RO or SRO was not the same individual.

- o No records were available to indicate that two staff supervision SROs reviewed any of the seven emergency operating procedures (EOPs) issued in January 1986. The licensee issued a memorandum during the inspection stating that the two SROs were exempt because they were intimately involved in the preparation of the EOPs.
- o No records were available to indicate that two on-shift ROs and one on-shift SRO reviewed EOP-20, "Functional Recovery Procedure," issued in January 1986. Both ROs and the SRO reviewed EOP-20 during the inspection and submitted the appropriate records to indicate completion of the review.
- o No records were available to indicate that one on-shift SRO and one staff supervision SRO reviewed the inverter and battery modification update issued in March 1986. Both SROs reviewed the modification during the inspection and submitted the appropriate records to indicate completion of the review.
- o No records were available to indicate that one on-shift SRO reviewed change 95 to the plant's Technical Specifications. Change 95 was issued in February 1986. The individual submitted the appropriate record during the inspection to indicate completion of the review.
- o No records were available to indicate that one on-shift SRO reviewed the latest revision to Procedure SO-57, "Installation of Temporary Lead Shielding." The individual submitted the appropriate record during the inspection to indicate completion of the review.
- o No records were available to indicate individuals who were exempt from taking requalification exams because of their involvement in preparing or grading the licensee-produced requalification exam. The licensee issued a memorandum during the inspection stating the exemption from taking the requalification exam.
- o No records were available to indicate the use of a site audit SRO exam as an adequate replacement exam for the annual requalification exam by individuals who failed to obtain an SRO upgrade license from the NRC. Note: The NRC SRO upgrade license exam was given during the time frame when the annual requalification exam was given. Had the individuals received their SRO license there would be no requirement for a requalification exam as an RO. The licensee issued a memorandum during the inspection stating the use of the site audit SRO exam was an adequate annual RO requalification exam.
- o The original copy of the audit examination for four of the six individuals in the accelerated requalification program (see

paragraph 4) was found by the licensee in their personal files in lieu of the training department files. The licensee retrieved the examinations from each individual and placed the examination in the training department files.

The missing records were provided by the licensee during this inspection and entered into the appropriate filing system. These records were completed only after the NRC inspectors notified the licensee that the records were not available.

The instances described above are examples of the licensee's failure to maintain records as required by Appendix A to 10 CFR Part 55A and Appendix B of the licensee's training manual. This potential violation will be considered an unresolved item. (285/8624-01)

Past inspections of the licensed operator training program by the NRC have indicated problems in the area of maintaining records. The inspection details are provided in NRC Inspection Reports 50-285/81-02 and 50-285/85-02. In addition, during an audit performed by the licensee's Safety Audits and Review Committee (SARC) in March 1986, the SARC identified a similar problem with the training record system for staff personnel training activities. The problem in identifying and maintaining an adequate record system for training activities appears to be an ongoing problem.

One SRO had failed his requalification exam given in November 1984. On March 7, 1985, he took a requalification exam which was administered by Region IV Operator Licensing Section. The exam administered by Region IV served as the requalification exam for Fort Calhoun Station in 1985 for those individuals who participated in the exam. The passing of this exam fulfilled the requirements of requalification for 1984. However, the individual had not fulfilled the requirements for 1985 which requires the passing of another requalification exam in 1985. This is an apparent violation of the requalification plan. Further discussions with the licensee, Region IV, and the NRC's Office of Nuclear Reactor Regulation (NRR) were conducted. It was concluded by Region IV and NRR that a one time only exception would be granted for meeting the 1984 requalification retake exam and the 1985 requalification exam requirements using one exam. The licensee committed to taking corrective actions to prevent a similar recurrence.

Items of concern noted in this area were as follows:

- ° Several attendance sheets had the participants names hand printed instead of the participants signatures
- ° Several quizzes were given without approval signatures on the cover sheet

- ° Operational Review Program forms were signed without the title being designated in the title block of the form. The only means of identification was a number code in the upper right hand corner. A code identification cross reference was needed to identify the title.

The licensee acknowledged these concerns and committed to appropriate corrective actions.

b. On-The-Job Training

During this inspection, the NRC inspectors noted problems associated with on-the-job training received by the licensed operators. The requirements for on-the-job training are provided in Section 3 of Appendix A to 10 CFR Part 55 and Section 8.c of Appendix B to the licensee's training manual. These requirements state that each licensed operator shall perform control manipulations and plant evolutions. Examples of the failure to provide on-the-job training are provided below.

- ° The list of control manipulations and plant evolutions in Section 8.c of the training manual includes loss of instrument air and loss of shutdown cooling. The training manual notes that these two activities will be performed as a walk through at the plant in lieu of being performed at the simulator. The licensee's training manual and 10 CFR Part 55, Appendix A requires that these evolutions be completed once every two years. The NRC inspectors noted that none of the ten individuals reviewed had completed a walk through or classroom lecture on the loss of instrument air or loss of shutdown cooling in 1984 or 1985.
- ° Section 8.c of the training manual established which control manipulations and plant evolutions will be performed at the simulator. The licensee has developed a simulator worksheet to provide a signoff for verification of completion of the manipulations and evolutions. The NRC inspectors noted that the simulator worksheet for loss of coolant was not completed for three of the seven operator simulator worksheets reviewed. Appendix B of the licensee's training manual requires that the loss of coolant scenario be performed on an annual basis.

The items listed above are examples of the licensee's failure to provide on-the-job training at the simulator or in the plant as required by Appendix A to 10 CFR Part 55 and Appendix B to the licensee's training manual. Failure to provide appropriate on-the-job training is a potential violation which will be considered an unresolved item. (285/86:4-02)

Licensee management stated that training department personnel will accompany all individuals attending simulator training in 1987. The

training personnel will ensure that all on-the-job training is performed and that records are signed off and retained.

c. Preplanned Lecture Series

During a review of training records, it was noted that the licensee had no objective evidence that would indicate that 15 of the ROs and SROs had attended the preplanned lectures on emergency procedures during 1984 and 1985. Section 7.a of Appendix B to the licensee's training manual and Section 3.d of Appendix A to 10 CFR Part 55 require that preplanned lectures be given on emergency procedures. This is a potential violation which will be considered an unresolved item. (285/8624-03)

In NRC Inspection Report 50-285/81-02, an NRC inspector noted the same problem during the performance of an inspection in January 1981. In a SARC audit performed in November 1984, an audit finding was issued which delineated the same problem. It does not appear that the licensee has taken appropriate action to correct this problem.

d. Remedial Training

During a review of training records it was noted that the licensee had no objective evidence that would indicate that the licensee was providing remedial training for four licensed individuals who scored less than 80 percent on quizzes given after a required lecture or series of lectures in 1984 and 1985. Section 4.b of Appendix A to 10 CFR Part 55 and Section 9.b and 9.f of Appendix B in the licensee's training manual require that remedial training be given to individuals who receive a failing grade on a required quiz. A score of less than 80 percent is considered a failing grade as defined in Section 9.b of Appendix B of the licensee's training manual. This is a potential violation which will be considered an unresolved item. (285/8624-04)

4. Licensed Operator Accelerated Requalification Program

In November 1985, the NRC administered a requalification examination to eight licensed operators. Of the eight individuals that took the examination, six failed to pass. Based on the results of the examination, the licensee established an accelerated requalification program for the affected individuals. In a letter dated December 23, 1985, the licensee provided a specific plan of the action that would be taken for requalification of the affected individuals. The purpose of this portion of the inspection was to verify that the actions had been completed by the licensee prior to reassigning the individuals to an onshift operating crew.

The licensee's letter stated that all operators that failed the examination would be removed from their assigned license duties. The reassignment of operators became effective on December 11, 1985. During

review of plant station logs, the NRC inspectors noted that one individual had been listed as a watch stander December 12-15, 1985.

In discussions with licensee management, it was explained to the NRC inspectors that the individual was still assigned to his normal onshift crew, but the individual was instructed not to perform any licensed operator activities. Due to the unavailability of the personnel involved, the NRC inspectors were not able to establish which duties were performed by the individual. This item remains open pending discussions with the individuals involved. (285/8624-05)

The licensee's letter also included actions planned for the remedial group. These actions included:

- ° A detailed review of the examination results with each individual
- ° Accelerated training in identified weak areas
- ° Frequent quizzes during training to ensure mastery of learning objectives
- ° Training on written examination skills for each member of the remedial group
- ° An audit examination for each member of the remedial group provided by a qualified consultant to check overall readiness for recertification

The NRC inspectors verified the above actions were completed. No problems were noted except for the maintenance of training records. The maintenance of records is discussed in paragraph 3.a of this report.

The letter also contained licensee commitments for upgrading the requalification program. The commitments are listed below:

- ° Improved attendance at scheduled requalification training sessions
- ° Provide performance-based training materials to licensed personnel and to the NRC
- ° Address the need for improved on-the-job training, especially for SRO personnel

The licensee has not fully implemented any of the commitments to upgrade the requalification program. Licensee management stated that the new program commitments were in the process of being completed. The status of the commitments are provided below.

- ° Improved attendance - a new management policy will be issued by October 1986 to encourage lecture attendance.

- ° Provide performance-based training materials - lesson plan upgrade to performance-based training will be completed in the near future.
- ° Address the need for improved on-the-job training - for the SRO class beginning in September 1986, a new qualification manual with new qualification requirements will be used.

A review will be performed to verify the commitments listed above have been completed during a future NRC inspection. This is an open item pending a review by the NRC to verify completion of the commitments by the licensee. (285/8624-06)

This inspection was performed to verify the completion of licensee commitments made as a result of the NRC examination administered in November 1985. This inspection is not a recertification of the license requalification program. The determination of the acceptability of the licensee's requalification program to acceptable NRC standards will be performed by the NRC Region IV Operator Licensing Section during a future inspection.

The licensee is working on INPO accreditation for training and expects to have INPO board approval during 1986.

No violations or deviations were identified in the area.

5. Inspection Observations

The NRC inspector participated in licensed operator classroom instruction and made the following observations:

- ° Yellow transparencies with black lettering were difficult to read, especially for people in the back rows
- ° Some hand-drawn graphics were difficult to follow

These observations are neither violations nor unresolved items. These items were noted for licensee consideration for program improvement and have no specific regulatory requirement. The licensee acknowledged these observations and will consider them for review.

6. Unresolved Item

An unresolved item is a matter about which more information is required in order to determine whether it is acceptable, a violation, or a deviation. Four unresolved items are discussed in paragraph 3 of this report.

<u>Item</u>	<u>Paragraph</u>	<u>Subject</u>
285/8624-01	3.a	Failure to maintain training records
285/8624-02	3.b	Failure to conduct on-the-job training

285/8624-03	3.c	Failure to have training records
285/8624-04	3.d	Failure to give remedial training

6. Exit Meeting

An exit meeting was conducted at the conclusion of the inspection. The NRC inspectors summarized the scope and findings of each inspection segment at the meetings.