

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-213/86-14

Docket No. 50-213

License No. DPR-61

Licensee: Connecticut Yankee Atomic Power Company
P.O. Box 270
Hartford, Connecticut 06107

Facility Name: Haddam Neck Plant

Inspection At: Haddam, Connecticut

Inspection Conducted: June 16-17, 1986

Inspectors:	<u><i>N. F. Dudley</i></u>	<u>7-11-86</u>
	N. F. Dudley, Lead Reactor Engineer (Examiner)	date
	<u><i>R. M. Keller</i></u>	<u>7/16/86</u>
	R. M. Keller, Chief, Reactor Projects Section 1C	date
Approved by:	<u><i>H. B. Kister</i></u>	<u>8/10/86</u>
	Harry B. Kister, Chief, Projects Branch No. 1, Division of Reactor Projects	date

Summary: An inspection of the requalification and initial licensing training programs was conducted. The procedures by which the training programs were being conducted and the Nuclear Training Manual chapter concerning documentation of program requirements had not been approved. Therefore, a determination of program compliance with facility requirements was impossible. Since most management control systems had not been implemented, it was difficult to determine if the program was being conducted in accordance with the draft procedures.

DETAILS

Scope:

An unannounced inspection of the requalification and initial license training programs was conducted. The review involved verification of the program's conformance to the requirements of 10 CFR 55 and included an audit of selected personnel training records, formal lesson plans, system modifications, LER's, training schedules, requalification attendance, requalification examinations, and administrative controls.

Findings:

The requalification program implementing procedure was approved in October 1985. The program changed the frequency of conducting portions of the requalification annual examination. The program has not been submitted to the NRC for approval in accordance with 10 CFR 50.54 (i-1). The Assistant Training Supervisor stated that the training programs have been conducted in accordance with draft copies of new implementing procedures since the beginning of 1986. As a result, training is being conducted with unapproved training procedures which have not been reviewed by the NRC.

The Nuclear Training Manual (NTM) was approved in March 1986 and details training requirements and the organization of the training department. NTM Chapter 1.16, which deals with record requirements and document controls, has been deleted. As a result there is no mechanism to document or verify the completion of training requirements. The inspection team attempted to verify the completion of various training requirements with the following results.

- Initial license training attendance forms were adequate. However the forms were filled out in an unprofessional manner. Some grades were filled out where no candidates' name existed. Some forms had social security numbers. Others did not. The students had defaced the official names on some attendance forms.
- Even though requalification training attendance records were kept, there was no verification made that all operators had attended all lectures. There were no instances found where an operator had not attended a lecture.
- Plant Design Change Requests (PDCR) have been satisfactorily incorporated into lesson plans and training material. However, there is no program for ensuring all Training Revision Assessment Forms concerning PDCR's have been correctly processed by the training department.
- The initial licensing programs do not specify how an individual's knowledge deficiencies are to be upgraded following a failure on a written or operational examination.

- Letters detailing an operator's removal from shift, retraining, and re-assignment to shift were not contained in his training records. Some letters for some operators had been maintained by the operations department.

Requalification training was conducted in 1985 on fire protection since numerous Licensing Event Reports (LER) in 1985 dealt with this area. Nine of the 19 LER's for 1986 have dealt with fire protection. In each case, justification was provided by an instructor for not including the event in the 1986 requalification program. No review for these decisions was made by a supervisor. It is felt adequate training has been provided in this area. However, there is a concern whether an adequate supervisory review of requalification program training items is being conducted.

Different views exist within the utility management on the status of the implementation of the training program. For example, on the issue of tracking attendance at requalification lectures the Assistant Training Supervisor stated that tracking attendance was not necessary as long as an operator passed the examination at the end of the training. The Training Supervisor recognized the need for a system to track attendance, but indicated it would be months before development would begin on the control system. The Manager, Operator Training, indicated that attendance was of utmost importance and that a control system was presently being implemented.

The initial simulator session for one crew was rescheduled so that the crew could support efforts associated with a 10 CFR 50 Appendix R inspection. This indicates that simulator training receives a lower priority than support functions to the operations department.

Conclusion:

Connecticut Yankee's Training Programs are undergoing major modifications. A long term plan for the requalification program was provided to the NRC on February 1, 1985. Portions of that program still have not been implemented. There are no effective evaluations or audits conducted of the training programs by supervisory personnel. As a result, there is no clear understanding by management how the training programs function.

Future inspections of the training programs will be necessary to evaluate the adequacy of the new programs.

Personnel Present At Exit Interview:

NRC Personnel

P. Swetland, Senior Resident Inspector
 N. Dudley, Lead Reactor Engineer (Examiner)
 S. Barber, Reactor Engineer (Examiner)
 D. Silk, Reactor Engineer (Examiner)

Facility Personnel

R. Gracie, Operations Assistant Supervisor
H. Haynes, Manager, Operations Training
B. Ruth, Training Supervisor
J. Deveau, Assistant Training Supervisor

Summary of Comments Made At Exit Interview:

The inspector stated that the training provided by the requalification program is improving and that progress is being made by the training department on improving the training process. However, adequate administrative controls of the training process do not exist. The inspector cited the use of a draft copy of the implementing procedures to run the training program. Also, there is no tracking system for training commitments such as training revision assessments and PDCR changes which affect the simulator. The Manager, Operations Training, indicated this was not a problem since the Nuclear Training Manual had been approved in March. The inspector stated that the chapter in the Nuclear Training Manual concerning document control had been deleted. Also, documentation of operators being removed from licensed duties, retrained and reassignment to licensed duties were not in their training records. The Manager, Operations Training, pointed out that these documents existed but had been sent to Nuclear Records. Finally, the inspector cited the lack of a system for assurance of lecture attendance. The Manager, Operations Training, stated that attendance was important and a system for tracking attendance was being or had been implemented.

The inspector stated a concern that the problems noted during the inspections had been identified for over a year. The Manager, Operations Training, explained that there had been a major shift in management in the last year and that he felt significant progress had been made in the last year.