



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA STREET, N.W., SUITE 2900  
ATLANTA, GEORGIA 30323

Report No.: 50-302/87-13

Licensee: Florida Power Corporation  
3201 34th Street, South  
St. Petersburg, FL 33733

Docket No.: 50-302

License No.: DPR-72

Facility Name: Crystal River 3

Inspection Conducted: April 27 - May 1, 1987

Inspector: M. B. Shymlock for  
S. D. Stadler, Lead Inspector

20 May '87  
Date Signed

Team Members: H. O. Christensen  
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Approved by: M. B. Shymlock  
M. B. Shymlock, Chief  
Operational Programs Section  
Division of Reactor Safety

20 May '87  
Date Signed

SUMMARY

Scope: This routine, announced inspection involved the review of corrective actions for previous findings in the areas of training and maintenance. Although the licensee was in the process of revising procedures and programs associated with licensed operator training and retraining in anticipation of the new 10 CFR 55A Rule, this inspection was conducted using the existing approved procedures and programs.

Results: No violations or deviations were identified.

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## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Personnel

- \*W. S. Wilgus, Vice President of Nuclear Operations
- \*W. K. Bandhauer, Assistant Nuclear Plant Operations Manager
- \*P. S. Bassa, Nuclear Security Specialist
- \*P. D. Breedlove, Nuclear Records Management Supervisor
- \*J. L. Buchner, Nuclear Compliance
- \*R. E. Carbiener, Nuclear Modifications Specialist
- \*E. R. Carlson, Training Consultant, Educational Resources
- \*T. A. Kamann, Nuclear Operations Records Manager
- \*L. C. Kelly, Manager Nuclear Operations Training
- \*J. H. Lander, Manager Nuclear Maintenance & Outages
- \*M. S. Mann, Nuclear Compliance Specialist
- \*P. F. McKee, Director, Plant Operations
- \*T. J. Neaman, Nuclear Security Officer
- \*D. E. Porter, Senior Licensing Engineer
- \*W. L. Rossfeld, Nuclear Compliance Manager
- \*E. C. Simpson, Acting Director Nuclear, Site Support
- \*D. L. Watson, Nuclear Training Academic Specialist
- \*G. R. Westafer, Quality Programs Director

#### NRC Resident Inspector

\*J. E. Tedrow

\*Attended Exit Meeting

### 2. Exit Interview

The inspection scope and findings were summarized in an exit interview on May 1, 1987, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings listed below. No dissenting comments were received from the licensee.

<u>Item Number</u>	<u>Status</u>	<u>Description</u>
EA 86-37 VIO A	Closed	Reduction in the Scope of the NRC-Approved Licensed Operator Requalification Training Program without Prior NRC Approval (Paragraph 3.a)
EA 86-37 VIO B	Closed	Failure to Establish, Implement, and Maintain Adequate Training Department Procedures (Paragraph 3.b)

EA 86-37 VIO C	Closed	Failure to Maintain Adequate, Legible and Retrievable Records of Licensed Operator Training and Retraining, and Failure to Detect Numerous Training and Training Record Deficiencies During QA Audits (Paragraph 3.c)
EA 86-37 DEV A	Closed	Failure to Adequately Implement NUREG-0737 Item I.A.2.3 (Paragraph 3.d)
EA 86-37 DEV B	Closed	Failure to Provide Operational Experience Feedback Training to All Licensed Personnel per NUREG 0737 Item I.C.5 (Paragraph 3.e)
VIO 302/85-01-01	Closed	Failure to Take Adequate Corrective Action to Resolve a Previously Identified Deficiency and to Fulfill a Commitment to the Commission (Paragraph 3.f)
VIO 302/85-01-02	Closed	Failure to Implement an NRC Approved Requalification Program for Licensed Individuals (Paragraph 3.g)
VIO 302/85-01-04	Closed	Failure to Follow Training Procedures (Paragraph 3.h)
UNR 302/85-01-05	Closed	Inconsistencies and Deficiencies in Training Records of December 1984 Replacement Class (Paragraph 3.i)
VIO 302/85-01-07	Closed	Failure to Implement NUREG 0737 Training per NRC Order (Paragraph 3.j)
UNR 302/85-01-08	Closed	Inspector Concerns Pertaining to Incomplete Training Records (Paragraph 3.k)
UNR 302/85-01-09	Closed	Failure to Maintain Adequate and Retrievable Records and Detect Multiple Record Deficiencies During QA Training Audits (Paragraph 3.l)
UNR 302/85-01-13	Closed	Negation of Training Commitments, Procedural Cross-Referencing Deficiencies, and the Transfer of Major Responsibilities to Lower Levels of Training Supervision (Paragraph 3.m)
UNR 302/85-01-14	Open	Utilization of a Non-Degreed Individual as Shift Technical Advisor (Paragraph 3.n)



UNR 302/85-22-01	Closed	Licensee Revision of Training Department Procedures (TDPs) Regarding Acceptability of Credit for Training Outside Established Program (Paragraph 3.o)
VIO 302/86-04-03	Closed	Failure to Implement Procedures (Paragraph 3.p)
UNR 302/86-04-05	Closed	Inspector Concerns Pertaining to the Reactor Coolant Radial Vibration Indication System and Associated Setpoints, Parameter Trending, and Surveillance Acceptance Criteria (Paragraph 3.q)
VIO 302/86-21-01	Closed	Failure to Follow Licensed Operator Requalification Training Program Regarding Nine Individuals who Received Unsatisfactory Simulator Performance Ratings (Paragraph 3.r)
IFI 302/83-04-02	Closed	Inconsistencies Between FSAR Section 12C and 10 CFR 55 Appendix A (Paragraph 4.a)
IFI 302/83-04-03	Closed	Inconsistencies Between TDP-203, FSAR Section 12C and 10 CFR 55 Appendix A (Paragraph 4.a)
IFI 302/85-01-12	Closed	Inspector Concerns on General Employee Training (Paragraph 4.b)
IFI 302/86-04-01:	Closed	Evaluate Cause of Reactor Protection System Low Pressure Channel B Trip and Conduct Instrument Calibration (Paragraph 4.c)
IFI 302/86-04-02:	Closed	Evaluate other Reactor Coolant Pumps (RCPs) with Respect to Failure of RCP 1A (Paragraph 4.d)
IFI 302/86-04-04	Closed	Inspector Concerns Pertaining to Operator Response to Abnormal Events (Paragraph 4.e)
IFI 302/86-04-06	Closed	Review Quality Control Inspection Documentation of Safety-Related Pipe Supports Reinstalled After Relief Valve Testing (Paragraph 4.f)
IFI 302/86-04-07	Closed	Assess Testability & Inservice Test Program Coverage of Emergency Feedwater Valve EFV-14, which is in a Fire Resistant Sealed Enclosure (Paragraph 4.g)



IFI 302/86-21-02	Closed	Requalification Program Lacked Formal Mechanism to Notify Operators Relieved of Duty, and Document (Paragraph 4.h)
IFI 302/86-21-03	Closed	Equivalency of the Instant SRO Training Program to the FSAR Cold License Training Program (Paragraph 4.i)
IFI 302/86-21-04	Closed	Requested Licensee Review of Replacement Operator Program Records for Unsatisfactory Simulator Performance (Paragraph 4.j)
IFI 302/86-21-05	Closed	Implementation of FSAR Chapter 12 Appendix C Requirements for Annual Drills and Semi-annual EP/AP Walkthroughs (Paragraph 4.k)

The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspectors during this inspection.

### 3. Licensee Action on Previous Enforcement Matters (92702)

On October 23, 1986, the NRC issued a Notice of Violation and Proposed Imposition of Civil Penalty, and a Notice of Deviation, related to inspection reports 302/85-01 and 302/85-22. This enforcement action combined violations, deviations, and unresolved items discussed in these two inspections. To ensure that all of the inspection findings presented in reports 85-01 and 85-22 have been addressed, this section of the report presents closeout of the violations both as they appeared in the Escalated Enforcement Action and as they originally appeared in the inspection reports.

- a. (Closed) EA 86-37 VIO A: Reduction in the Scope of the NRC-Approved Licensed Operator Requalification Training Program without Prior NRC Approval

Violation A of Escalated Enforcement Action 86-37 identified the following examples of requirements which had been deleted from the scope of the requalification program without the required prior NRC approval:

- (1) Requirement of an 80 percent pass grade on lecture examinations or attendance at remedial training
- (2) Instructional sessions and emergency drills conducted by Shift Supervisors
- (3) A minimum of 40 hours of requalification lecture attendance
- (4) Walkthrough of procedures for individuals not completing required quarterly procedure reviews
- (5) Use of annual requalification examination results to determine topics to be emphasized during the following requalification period
- (6) Review of a licensed operator's entire training file by the operations manager prior to license renewal.

The inspectors determined that the licensee has made significant improvements in the management controls of the Licensed Operator Requalification Program.

Subsequent to the inspection detailed in Inspection Report 302/85-01, the licensee revised the Licensed Operator Training Program as contained in Section 12C of the FSAR. Over 500 commitments had been identified and reinserted into applicable documentation where missing. The revised program was submitted to the Commission and was approved in a letter dated June 12, 1986.

The inspectors reviewed FSAR Section 12C and the training procedures associated with licensed requalification training to ensure that previously deleted requirements had been reestablished. The approval of the revised requalification program and the onsite review of the program and procedures by the inspectors indicated that the reductions in scope of the program in the areas cited in the violation have been adequately resolved and reestablished. Additional details on the closure of the specific examples of the violation listed above are provided in the discussion of the closeout of VIO 85-01-01 (Paragraph 3.f).

Additionally, the licensee has established administrative controls to ensure that the scope of the requalification program will not be reduced without prior NRC approval. A "caution" statement in Section 2.0 of TDP-203, Licensed Operator Requalification Training Program, requires prior NRC authorization of all changes to the approved Licensed Operator Requalification Training Program by which the scope, time allotted for the program, or the frequency in conducting different parts of the program is decreased. In addition, Section 6.8.1 of TDP-100, Preparation and Control of Nuclear Operations Training Department Procedures, requires that any changes to TDP-203 which could similarly reduce the scope be submitted to the NRC. These changes shall not be made unless authorized by the NRC under 10 CFR 50.54 (i-1).

A commitment tracking system was implemented which requires the review of all commitments made against a procedure before revising it. A Nuclear Operations Training Information (NOTIS) computer system was also established which tracks all required training and the timely completion of items by designated individuals.

Based on this information, the item is closed.

- b. (Closed) EA 86-37 VIO B: Failure to Establish, Implement, and Maintain Adequate Training Department Procedures



Violation B of Escalated Enforcement Action 86-37 included the following examples of failure to establish, implement, and maintain adequate training procedures:

- (1) Failure to establish or implement procedures controlling the administration, grading, and review of examinations
- (2) Failure to implement procedural requirements for semiannual evaluations of all licensed operators and senior operators
- (3) Failure to implement procedural requirements to use approved lesson plans in conducting requalification training
- (4) Failure to implement procedural requirements for semi-annual evaluations of training instructors.

The inspectors determined that the licensee has improved their administrative controls of procedural requirements through revisions to training procedures and through implementation of the computerized Nuclear Operations Training Information System (NOTIS).

Details on the closure of the above examples of EA 86-37 VIO B are provided in the sections of the report covering the closure of VIO 85-01-02, VIO 85-01-04, and VIO 85-01-05 (Paragraphs 3.g.5, 3.h.1, 3.h.2 and 3.h.4).

- c. (Closed) EA 86-37 VIO C: Failure to Maintain Adequate, Legible, and Retrievable Records of Licensed Operator Training and Retraining, and Failure to Detect Numerous Training and Training Record Deficiencies During QA Audits

The following examples of record discrepancies were identified as Violation C of Escalated Enforcement Action 86-37:

- (1) Missing or lost original hard copy training files
- (2) Ungraded examinations and records of oral boards and walk-throughs
- (3) Unsigned examinations
- (4) Unsubstantiated written examination grade changes
- (5) Incomplete on-shift time sign-offs by backup licenses
- (6) Incomplete quarterly procedure review sign-offs
- (7) Missing documentation for instructor qualifications training
- (8) Missing documentation for three months control room experience prior to writing for NRC SRO license
- (9) Microfilm training records stamped poor copy with sections illegible
- (10) Missing SRO license training records
- (11) Missing records of engineer training

The licensee has corrected the identified deficiencies in examinations, and other incomplete or missing records. A hard-copy working file was established in accordance with Training Department Procedure TDP-109, Training Records Management, Revision 6. Additionally, an



extensive team review and revision of all licensed operator training and retraining policies, practices, procedures and records was conducted. Additional details on the specific deficiencies cited under the violation are contained in the closeout of Violations 85-01-05, and 85-01-09, and Unresolved Items 85-01-08 and 85-01-13 (Paragraphs 3.i, 3.l, 3.k and 3.m).

Management Control was significantly improved by the implementation of the Nuclear Operations Training Information System (NOTIS) to track completion of training program requirements. Important changes were made to the planning and conduct of QA audits of licensed operator training and qualifications.

Based this information, the item is closed.

- d. (Closed) EA 86-37 DEV A: Failure to Implement NUREG 0737 Item I.A.2.3, Administration of Training Program

NUREG 0737 Item I.A.2.3 had not been adequately implemented in that instructors were permitted to teach systems, integrated plant operations, and the simulator to licensed personnel without first demonstrating SRO qualifications by completion of an NRC SRO examination and active participation in a requalification program.

In response to the NRC Safety Evaluation Report (SER) on the licensees Licensed Operator Training and Requalification programs, a letter dated July 28, 1986, committed to revise the required qualifications for instructors. Certified instructors who teach systems which are unique to nuclear plants or are covered by Technical Specifications, integrated plant response, simulator training or transients to licensed operators or license candidates, must participate in the full Licensed Operator Requalification Training Program with the following clarifications:

- (1) If the instructor taught the course or topic in either Licensed Operator Requalification Training or Replacement Operator Training, credit will be given for lecture attendance.
- (2) Regarding the annual written examination, no more than two persons who are responsible for exam preparation and grading may be excused from the exam. The same personnel may not be excused from the exam for two consecutive years.
- (3) The instructor will spend one on-shift day every four (4) months performing activities specified by the Training Supervisor.
- (4) On-shift drills for certified instructors will be satisfied by successful completion of five (5) days of simulator training annually.

- (5) Semi-annual operator evaluations will be replaced, for certified instructors, by two (2) annual instructor evaluations, one conducted by the Training Supervisor and one conducted by the Academic Specialist.

The inspector reviewed TDP-111, Instructor Qualification and Evaluation Program, Revision 2, and verified the incorporation of the above commitments. Appendix B to TDP-111 lists those subjects which require qualification as a Nuclear Operations Instructor (NOI) including compliance with the above listed commitments. These subjects include systems, integrated plant response, transient analysis, and simulator training. Section 6.3.3.1 of TDP-111 requires all NOIs maintaining a "backup" license status to participate in the full Licensed Operator Requalification Program. Effective September 1, 1986, NOIs without a current NRC SRO license are also required to participate in the full program with limited exceptions.

Based on this information, the item is closed. Closing this Deviation also closes Example 9 of Violation 85-01-01, Example 1 of Violation 85-01-02, and Example 1 of Violation 85-01-07 (Paragraphs 3.f, 3.g and 3.j).

It should be noted that the licensee submitted a letter dated December 2, 1986, requesting a revision of certain commitments previously made in response to the SER. The letter indicated that the original commitments as described in the July 28, 1986 submittal would interfere with the expeditious temporary and permanent expansion of the training staff. The above closure of the deviation involving licensed or certified instructors does not imply approval of the licensee's December 1986 request.

- e. (Closed) EA 86-37 DEV B: Failure to Provide Operation Experience Feedback Training to All Licensed Personnel per NUREG 0737 Item I.C.5

The licensee had not required all licensed personnel to attend or complete operational experience feedback training. The licensee's response to the Deviation indicated that this occurred for several reasons including illness, conflicting work schedules, a shortage of operators, and the lack of adequate attendance records and training documentation.

TDP-203, Licensed Operator Requalification Training Program, has been revised to formalize the dissemination of operating experience feedback information including Licensee Event Reports (LERs), Significant Events Reports (SERs), and Significant Operating Event Reports (SOERs). All operational experience feedback information is required to be evaluated utilizing the "Infotrak Routing Form" which is attachment 3 to TDP-105, Lesson Plan Preparation. This form assists in determining if the information should be distributed through required reading, on-shift training, or classroom "special training," and whether training materials need to be revised. Once



the mode of distribution is selected, a scheduled completion date is selected and the information is entered into the Nuclear Operations Training Information System (NOTIS) along with a list of all required information recipients. This system will in turn ensure that the training is completed and documented by the due date by the required personnel, or will generate exception reports as warranted. Attendance at Operational Experience Feedback Training is documented per the requirements of TDP-109, Training Records Management, and entered into NOTIS.

In addition, the licensee has expanded the available requalification classroom time by 50 percent (3 to 4.5 days) in order to move a significant portion of the training from on-shift to the classroom. The inspector reviewed several recent examples of operational experience feedback material and verified that the requirements of the TDP's are being met, and the information is provided to all licensed personnel on a timely basis.

Based on this information, the item is closed. Closure of this item also closes Example 2 of Violation 85-01-02, and applies to the closure of Violation 85-01-07 (Paragraphs 3.g and 3.j).

- f. (Closed) VIO 302/85-01-01: Failure to Take Adequate Corrective Action to Resolve a Previously Identified Deficiency and to Fulfill a Commitment to the Commission

The licensee had failed to take corrective action to prevent the recurrence of previous violations involving reductions in the requalification program and failures to follow training requirements, as specified below.

- (1) Example 1 -Failure to require utilization of the results of the annual requalification examination to determine topics to be emphasized in the following year's requalification schedule

TDP-203, Licensed Operator Requalification Training Program, Revision 7 requires the licensee to determine the depth of coverage for each lecture topic based on the review of semi-annual performance evaluations, annual written requalification examination results, and several other commitment items. The licensee prepared semi-annual reports which aid in the subject selection.

This example of Violation 85-01-01 is closed. Additionally, this closes of Violation A Example 5 of EA 86-37 (Paragraph 3a).



- (2) Example 2 - Failure to require remedial training for individuals scoring less than 80 percent on Requalification Examinations

The licensee had reduced the passing grade for examinations from 80 percent to 70 percent. Procedure TDP-203, Revision 7 now requires an overall examination grade of 80 percent and a grade of at least 70 percent in each category.

This example of VIO 85-01-01 is closed. Additionally, this closes Violation A Example 1 of EA 86-37 (Paragraph 3.a).

- (3) Example 3 - Failure to require the Nuclear Plant Training Manager to review the licensee's entire training record and evaluate the level of understanding

Procedure TDP-210, NRC License and Certification Application Process, Revision 2, now requires the Nuclear Plant Training Manager to review and verify the licensee's training record for completeness and accuracy. The inspectors reviewed selected license or certification application checklists and verified the performance of TDP-210.

This example of VIO 85-01-01 is closed. Additionally, this closes Violation A Example 6 of EA 86-37 (Paragraph 3.a).

- (4) Example 4 - Failure to require annual instructional sessions and emergency drills to be conducted on abnormal and emergency procedures by the Shift Supervisor

Procedure TDP-203, Revision 7 implements the FSAR requirement to conduct at least one abnormal procedure or emergency procedure walkthrough annually. A licensed or certified SRO designated by the Operations Superintendant conducts annual emergency drills for the Shift Supervisor. These drills are documented on the Quarterly Review Records. The inspectors reviewed selected records and verified the completion of this requirement.

This example of VIO 85-01-01 is closed. Additionally, this closes Violation A Example 2 of EA 86-37 (Paragraph 3.a).

- (5) Example 5 - Failure to require individuals who do not complete reviews and operations assigned by the end of a quarter to be walked through the operations by the Shift Supervisor

TDP-203, Revision 7 requires that if operational activities included in the quarterly review requirements are not performed, they shall be walked through with the Shift Supervisor or

another designated SRO using the appropriate procedure. The inspectors reviewed selected records and verified that the quarterly review and walkthrough requirements of TDP-203 were satisfied.

Based on this information, the example is closed. Additionally, this closes Violation A Example 4 of EA 86-37 (Paragraph 3.a).

- (6) Example 6 - Failure to require a minimum of 40 hours of requalification lectures to be attended by each licensed operator and back-up operator per year

TDP-203, Revision 7 requires the requalification lecture series to involve at least 40 contact hours of instruction for each licensed operator per year. The inspector reviewed selected requalification lecture attendance records, and determined that they met or exceeded the requirement for 40 contact hours.

This example is closed. In addition, this closes of Violation A Example 3 of EA 83-37 (Paragraph 3.a).

- (7) Example 7 - Failure to require individuals who fail the annual requalification examination to be removed from licensed duties

TDP-203, Revision 7 requires an individual who scores less than 70 percent in each category or 80 percent overall on the requalification examination to be removed from licensed duties until an accelerated requalification program has been satisfactorily completed. The inspectors reviewed selected training files and verified that individuals who did not pass the annual requalification examination had been removed from duty as required. This example of VIO 85-01-01 is closed.

- (8) Example 8 - Deletion in July 1984 of all 12 pages of the requalification program description contained in the FSAR

The licensee has resubmitted the requalification program as FSAR Revision 8, dated September 9, 1986. This item is closed.

- (9) Example 9 - Failure of licensed personnel to attend requalification training

The exemption of licensed instructors from annual requalification lectures and examinations was addressed in Deviation A of EA 86-37. Closeout of this example of VIO 85-01-01 is covered in Paragraph 3.d

- (10) Example 10 - Failure to conduct and review semi-annual evaluations of all licensed operators

Closure of this example is accomplished in connection with closure of Example 5 of VIO 85-01-02 and Example 2 of EA 86-37 (Paragraphs 3.g and 3.b).

Based on this information, VIO 85-01-01 is closed. As detailed in the sections for each example, closure of the violation also closes EA 86-37 Violation A.

- g. (Closed) VIO 302/85-01-02: Failure to Implement an NRC Approved Qualification Program for Licensed Individuals as Required by 10 CFR 50.54 (i-1) and 10 CFR 55, Appendix A.

- (1) Example 1 - Exemption of licensed instructors from annual qualification lectures and annual qualification examinations

This example is closed with the closure of 86-37 Deviation A (Paragraph 3.d).

- (2) Example 2 - Failure to require operational experience feedback training

This example is closed by the closure of 86-37 Deviation B and VIO 85-01-07 (Paragraphs 3.e and 3.j).

- (3) Example 3 - Failure to establish procedures to ensure and document that qualification lectures which are unavoidably missed are made up

TDP-109, Training Records Management, Revision 6, provides a training class attendance record as Attachment 2. Additionally, the licensee has established the Nuclear Operations Training Information System (NOTIS) which is used to track the training of individuals, including class attendance. There is also a "Program Activity Summary" which indicates the total classes the individual must take for a particular program, the actual classes attended, and the classes not attended.

Based on this information, Example 3 is closed. Additionally, this closes in part EA 86-37 Violation A (Paragraph 3.a).

- (4) Example 4 - Failure to provide examinations for each qualification lecture, and failure to provide remedial training and re-examination for individuals failing lecture quizzes



TDP-203, Licensed Operator Requalification Program, Revision 7, delineates the requirements for the administration of examinations as a part of the lecture series. The procedure also notes that individuals obtaining a grade of less than 80 percent shall be involved in a remedial training program. The remedial program shall be developed in accordance with TDP-113, Remedial Training Program, Revision 3. Within the remedial training program there are also provisions for testing in which the licensee must pass with a grade of 80 percent or better.

Based on this information, Example 4 of Violation 85-01-02 is closed.

- (5) Example 5 - Failure to perform systematic evaluation of the performance and competency of licensed operators and senior operators at the prescribed frequency nor in the prescribed manner.

TDP-203, Licensed Operator Requalification Training Program, Revision 7, requires semi-annual evaluations to be conducted and reviewed for each license holder. The inspector reviewed selected semi-annual evaluations and determined that the licensee had complied with TDP-203.

This example is closed. Additionally, this closes in part EA Violation B Example 2 of EA 86-37 and VIO 85-01-01 Example 10 (Paragraphs 3.b and 3.f)

- (6) Example 6 - Operations Superintendant and or Training Manager have not conducted an adequate review of each applicant's training prior to license renewal

Procedure TDP-210, NRC License and Certification Application Process, Revision 2, requires that the Nuclear Operations Training Manager verify the training records of each individual before the application is submitted to the Operations Superintendant. The Operations Superintendant must in turn verify the accuracy of the experience and education information prior to recommending the candidate for licensing.

Based on this information , the example is closed.

- (7) Example 7 - Records indicated that some licensed individuals had not completed assigned quarterly procedure reviews and had not walked through the procedures by the Shift Supervisor as required

Procedure TDP-203, Licensed Operator Requalification Training Program, requires signoff of a Quarterly Review Record identifying required on-shift reading and review activities. If quarterly review requirements are not performed, the procedures shall be walked through with the Shift Supervisor.

The inspectors reviewed a random sample of completed quarterly review records, and verified that the requirements of TDP-203 were met.

This example is closed.

- (8) Example 8 - Failure to have an approved requalification program in effect while the approved program was deleted

Currently, the licensee has in effect FSAR Appendix 12C, Licensed Operator Requalification Training Program, Revision 2, dated September 1, 1986. The NRC returned a Safety Evaluation Report finding the changes acceptable.

This example is closed.

- (9) Example 9 - Failure of SRO licensed instructors (backup licensees) to attend requalification training lectures and to take the annual requalification examinations

This example is closed by the closure of VIO 85-01-01 Example 9 of paragraph 3.f and Deviation A of EA 86-37 (Paragraph 3.d).

- (10) Example 10 - Failure to establish adequate examination controls and to ensure satisfactory completion of requalification training including failure to remove individual who failed examination.

An individual SRO was removed from duty when an NRC inspector discovered a grading error and determined he had failed the facility's annual requalification examination.

The individual was prohibited from returning to licensed duties until he had satisfactorily completed the accelerated requalification program and had passed a re-examination approved by the NRC. This re-examination did not have adequate procedural quality control to assure that the individual had satisfactorily completed the requalification training.

The inspectors determined that TDP-106, Revision 3, has been implemented to establish the process for developing, administering and grading examinations. These controls appeared adequate to ensure the control of examinations and the satisfactory completion of requalification training. The inspectors reviewed a sample of the April 1987 requalification examinations, which adhered to the requirements of TDP-106.

This example is closed. Additionally, this closes in part Violation B Example 1 of EA 86-37 (Paragraph 3.b)

- (11) Example 11 - Failure to Conduct Semiannual Evaluation of All Licensed Operators

This example is closed with the closure of Violation 85-01-01 (Paragraph 3.f).

- h. (Closed) VIO 302/85-01-04: Failure to Follow Training Procedures as Required by 10 CFR 50, Appendix B, Criterion V

- (1) Example 1 - Failure to perform semiannual evaluations of instructors

In a letter to the NRC dated July 28, 1986, Florida Power Corporation committed to performing two annual instructor evaluations per year. One was to be conducted by the training Supervisor and the other conducted by the Academic Specialist. Procedure TDP-111, Instructor Qualification and Evaluation Program, Revision 2, implemented the commitment.

The inspector reviewed three sets of instructor evaluations and determined that the licensee is meeting their commitment. This example of VIO 85-01-04 is closed. Additionally, this closes in part Violation B Example 2 of EA 86-37 (Paragraph 3.b)

- (2) Example 2 - Failure to use approved lesson plans

Procedure TDP-105, Lesson Plan Preparation, Revision 9, requires instructors to use approved lesson plans when teaching. The inspector selected four lesson plans at random and verified that they had been approved and met the requirements of TDP-105.

This example is closed. Additionally, this closes in part Violation B Example 3 of EA 86-37 (Paragraph 3.b).

- (3) Example 3 - A Nuclear Quality Control (NQC) inspector was certified prior to having technical training as required by procedure NQC-1, Training and Qualification of Nuclear Quality Control Personnel.

Procedure NQC-1 has been replaced by Quality Programs Administrative Procedure (QAP)-33, Training and Qualification for Certification of QC Inspectors, Nondestructive Examination (NDE) Auditors and Calibration Laboratory Technicians, Revision 2. This procedure requires examinations to determine and/or verify the capabilities of an inspector to meet the qualification requirements of ANSI N45.2.6-78, Qualification of Inspection, Examination and Testing Personnel for Nuclear Power Plants.



The inspectors randomly selected two NQC inspector certification records to determine if they meet the requirements of QAP-33, and no deficiencies were noted. This example is closed.

- (4) Example 4 - Failure to conduct oral board in accordance with procedure TDP-203

The requalification program no longer requires oral boards. Normal, abnormal and emergency procedures are walked through on the semiannual evaluations, and the licensed operators are evaluated by the shift or assistant shift supervisor. The shift supervisor is evaluated by the Operations Superintendent or his designee. Procedure TDP-106, Examination Preparation, Administration, and Grading, Revision 3, has the requirements for oral examinations. This type of examination is conducted during RO and SRO replacement training.

The inspector reviewed selected licensed operator training records and it appears that oral examinations are conducted in accordance with TDP-106. This example is closed. Additionally, this item closes in part Violation B Example 1 of EA 86-37 and URI 85-01-05, example 2 (Paragraphs 3.b and 3.i)

- i. (Closed) UNR 302/85-01-05: Inconsistencies and Deficiencies in Training Records of December 1984 License Replacement Class

NRC review of the training records for the license replacement group of December 1984, had revealed failures to grade examinations, unsubstantiated upgrading of failed examinations, and information missing from training records. There were also inadequacies in the composition of oral boards, cited as Violation 85-01-04 and addressed elsewhere in this report (Paragraph 3.h.4). Training record discrepancies were cited in the EA 86-37 as Violation C (Paragraph 3.c)

In response to the discovery of these inadequacies, the licensee made improvements to the training program. TDP-106, Examination Preparation, Administration, and Grading, was developed. This procedure has subsequently been upgraded to Revision 3. TDP-202, Replacement Operator Training Program was clarified regarding the requirement of and the documentation of three months of on-the-job training. In addition, the licensee conducted extensive reviews of the licensed operator training files.

The inspector reviewed the upgraded training procedures and performed an in-depth review of the requalification examinations and examination grading for one candidate from each of the last two requalification groups (examination dates 2/20/87 and 4/20/87). The corrective actions taken by the licensee were considered adequate to close this item.

- j. (Closed) VIO 302/85-01-07: Failure to Implement NUREG 0737 Training Requirements per NRC Order

- (1) Example 1 - Failure to Implement NUREG 0737 Item I.A.2.3, Administration of Training Program

This example is closed with the closure of Deviation A of EA 86-37.

- (2) Example 2 - Failure to Provide Operation Experience Feedback Training

This example is closed with the closure of Deviation B of EA 86-37.

- k. (Closed) UNR 302/85-01-08: Inspector Concerns Pertaining to Incomplete Training Records

An NRC review of the training folders for four licensed instructors had identified missing records. This indicated that either the training had not been properly documented or had not been conducted.

The inspector reviewed TDP-111, Instructor Qualification and Evaluation Program, Revision 2, plus training records for three instructors and a list delineating the courses taught by each instructor. The review confirmed that instructor training records conform to the requirements of TDP-111 and that instructors are teaching only those courses for which they are qualified.

Based on this information, the item is closed. Additionally, this item closes in part Violation C, Example 1 of EA 86-37 (Paragraph 3.c).

- l. (Closed) VIO 302/85-01-09: Failure to Maintain Training Records and Conduct Adequate Audits as Required by 10 CFR 50, Appendix B, Criteria XVII and XVIII

An NRC review of the training records of licensed operators and instructors had identified multiple examples of incomplete documentation, missing or unretrievable entries, numerous discrepancies and errors, and difficult to retrieve or illegible microfilm copies. A review of the QA/QC audits performed during that period did not indicate that these multiple record keeping problems had been identified.

To correct the situation, the licensee established hard-copy working files at the Training Center for each hot license candidate and licensed operator so that records could be audited and retrieved on a daily basis. In cases where training records could not be found, additional training was conducted. While the procedure TDP-109,

Training Records Management, Revision 6 currently leaves it optional as to whether the Nuclear Training Supervisor will establish a hard copy working file of selected documents, the licensee has committed to change the "may" to "should."

The inspector reviewed the hard copy working files for three SROs and one RO and found these records to be complete, auditable, and well maintained. The Training Clerk was accurate and proficient in locating a wide variety of documentation. The records thus retrieved were exceptionally well kept. The official record for one of the SROs was spot checked and found to be complete.

The ineffectiveness of training audits has been corrected by revising QA Procedure QAP-9, Quality Program Audits, Revision 11. Audit planning criteria and scope statements have been improved to provide more explicit criteria for conducting audits and to require a present or past SRO to be on the audit team. A multi-disciplined review team conducted an extensive review of all licensed operator training and retraining policies, practices, procedures, and records. Deficiencies disclosed by this review team were documented and corrective actions taken. Training program procedures were significantly improved by the inclusion of specific documentation requirements and checklists.

Management control and overview of licensed operator training and retraining has also been significantly improved through implementation of the Nuclear Operations Training Information System (NOTIS). Specific information available to management for tracking includes expiration dates, attendance records, simulator requirements, commitments, and quarterly procedure reviews.

The inspector reviewed the results of a review by the multidisciplinary review team and the corrective actions taken as documented in Quality Program Deficiency Report numbers 85-QAS-003, 007, 010A, and 010, and Nonconformance Report 02844 dated September 11, 1986. These documents were found to be responsive to the need for a thorough QA audit of training records.

The corrective measures taken by the licensee have apparently corrected the existing inadequacies in maintaining training records and conducting audits. Based upon the reviews by the inspector and the commitment by the licensee to make the referenced change to TDP-109, this item is closed.

Additionally, this closes in part Violation C of EA 86-37 (Paragraph 3.c).



- m. (Closed) UNR 302/85-01-13: Procedure Revisions Negating Training Commitments, Procedural Cross-Referencing Deficiencies, and the Transfer of Major Responsibilities to Lower Levels of Training Supervision

(1) Training Commitment Tracking

Following training inspection 302/85-01, conducted in January 1985, the licensee determined that they had made over 500 commitments in the area of training. Although they had a computerized commitment tracking system in place, it was not being effectively implemented to ensure that commitments were not negated through revisions to Training Department Procedures (TDPs).

The training commitments contained in the Nuclear Operations Commitment System (NOCS) have been updated and consolidated, resulting in 335 commitments in the area of training at the time of the inspection. TDP-100, Preparation and Control of Nuclear Operations Training Department Procedures, Revision 5, now requires that all commitments against a specific procedure be evaluated to ensure that a proposed change does not negate the commitment. Attachment I to TDP-100 requires that a print-out of all commitments on NOCS for procedures to be revised be obtained from Compliance. The reviewer must then certify that either there are no applicable commitments against the procedure, or that the implementation of any commitment will not be adversely affected by the revision.

The inspector reviewed a NOCS printout associated with a proposed revision to TDP-202, Replacement Operator Training Program. The NOCS printout indicated 44 outstanding commitments against the procedure. The licensee was in the process of evaluating the proposed revision against each one of these commitments to ensure that no commitment would be negated.

The implementation of the NOCS for training procedure revisions, and the increased controls in TDP-100 over revisions and commitments, represent a major improvement and should prevent future problems in this area.

(2) Control of Procedure Revisions and Cross-Referencing

Inspection Report 302/85-01 Paragraph 17 noted that TDP-106, Examination Preparation, Administration, and Grading, had never been developed even though it was referenced in other TDPs. This lack of administrative control over examinations had resulted in numerous deficiencies in development, administration, grading, and documentation. TDP-106 has now been

developed and approved, with Revision 3 in place at the time of the inspection. This procedure represents a significant improvement in the administrative controls over the licensee's examination process.

It was also noted in January 1985 that a number of TDPs referenced other TDPs which were outdated or cancelled. The licensee had performed a review of all TDPs and had deleted all references to outdated or cancelled procedures by May 31, 1985. The inspector reviewed the reference sections of several TDPs and verified that all references to cancelled or outdated procedures had been deleted.

In addition, the licensee is in the process of establishing a cross-reference computer program to include all quality-related plant procedures. This program should help ensure that all procedures affected by a revision to a specific procedure are appropriately revised and also that all references remain valid. All TDPs and the Job Performance Manuals are scheduled to be included in this program, which should prevent the recurrence of the previous cross-reference problems.

### 3. Transfer of Training Responsibilities

The inspector reviewed TDP-101, Nuclear Operations Training Department Organization and Responsibilities, Revision 6, and several other TDPs controlling the training program, and determined that major responsibilities had been restored to the Nuclear Operations Training Manager. These responsibilities included: (1) the implementation and control of training activities, (2) the conduct of training programs including those conducted offsite or by contract personnel, (3) qualifications of training staff personnel, and (4) establishment of goals and objectives. A "caution" statement in Section 5.2 of TDP-101 requires that the Training Manager shall report directly to the Vice President of Nuclear Operations, and shall ensure that the retraining and replacement training programs shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI 18.1-1971 and 10 CFR 55.

Based on this above information, UNR 302/85-01-13 is closed. The corrective actions described above are also applicable to the closure of Violation A of EA Action EA 86-37 (Paragraph 3.a).

- n. (Open) UNR 302/85-01-14: Utilization of a Non-Degreed Individual as Shift Technical Advisor (STA)

In a letter to the Commission dated October 15, 1982, the licensee had indicated their intent to continue the policy of utilizing only degreed individuals as STAs. The letter failed to address that a

non-degreed individual was already in an STA position. NUREG 0737, Item 1.A.1.1 requires that an STA shall have a bachelors degree or equivalent in a scientific or engineering discipline. The licensee had determined equivalency for this individual based on experience and correspondence training courses, but had not sought NRC approval. They indicated to the inspectors that the INPO guidelines pertaining to STAs, and as endorsed by NUREG 0737, permit the utility to determine "equivalency." In a recent letter to the Commission, the licensee included a summary of the degree equivalency determination for this non-degreed STA. Pending review of this equivalency, this item will remain open.

- o. (Closed) UNR 302/85-22-01: Observed Discrepancies in Recertification Process

During the January 1985 inspection (302/85-01), it was noted that the licensee's training programs for non-licensed and licensed operators did not appear to meet the commitments made by the licensee in their May 5, 1982 letter to the NRC. The licensee had committed to a specific number of contact hours of training in mitigating core damage, heat transfer, fluid flow, and thermodynamics. The licensee reduced the number of training hours in their program based on taking credit for previous training outside of the established program at Crystal River.

Subsequently, the licensee has changed the subject training programs as described in TDP-201, Non-licensed Operator Training Program, Revision 5; TDP-202, Replacement Operator Training Program, Revision 5; and TDP-108, Revision 3 to performance based programs accredited under INPO guidelines. The contact hour commitment has therefore been replaced by a commitment to train the subject operators to an equivalent performance level which satisfies the requirements of a site specific job task analysis.

The inspector reviewed the three subject procedures and the May 5, 1982 letter from D. G. Mardis of Florida Power Corporation to J. F. Stolz, Chief of NRC Operating Reactors Branch #4. The corrective actions which were taken are adequate to close this item.

- p. (Closed) VIO 302/86-04-03: Failure to Implement Procedures

During a plant transient on January 1, 1986, the operators failed to complete all applicable actions per the approved emergency and abnormal operating procedures. In the performance of Abnormal Procedure AP-580, Reactor Protection System Actuation, immediate actions and some followup actions were performed from memory. During the course of this performance, three examples of failure to follow written and approved procedures were noted. NRC inspectors subsequently determined that, programmatically, the licensee's operators and operations management did not consider that remedial actions associated with the performance of emergency and abnormal need to



be followed verbatim, provided that the actions actually taken adequately restore the requisite parameters. Inspector review of administrative procedures in this regard indicated that authority for operators to deviate from prescribed remedial or detail actions did not exist.

The licensee has now revised Administrative Instruction 400, Plant Operations Quality Assurance Manual Control Document, to incorporate the following elements:

- (1) Operations personnel are expected to comply with all abnormal and emergency procedures as written
- (2) Verbatim compliance is required for all immediate actions
- (3) Verbatim compliance is required for all remedial actions when immediate actions can't be performed
- (4) All followup actions are to be completed as written except operator judgement may be exercised

Based on the above commitments, additional information in NRC Inspection Report 87-10, and the interim review of the EOP's Writer's Guide by both the licensee and INPO, this item is closed.

The licensee is completing a new Writer's Guide and a major revision to the emergency and abnormal procedures. The review of these procedures will be accomplished under Temporary Instruction (TI) 2515/79, Inspection of Emergency Operating Procedures.

- q. (Closed) UNR 302/86-04-05: Inspector Concerns Pertaining to the Reactor Coolant Pump Radial Vibration Indication System and Associated Setpoint, Parameter Trending, and Surveillance Acceptance Criteria

Subsequent to the January 1986 failure of Reactor Coolant Pump 1A and the resulting reactor trip, the NRC inspected the Reactor Coolant Pump 1A Radial Vibration Indication System and interviewed the licensee's engineering personnel. A number of inconsistencies were identified, including inadequate acceptance criteria, improper operation of the system and reading of vibration indicators, problems with "alert" and "danger" setpoints, and confusion regarding the responsibility for data evaluation.

The inspector reviewed Surveillance Procedure SP-300, Operating Daily Surveillance Log, Revision 92; Master Instrument Calibration List dated January 20, 1987; Request Engineering Information/Modification Approval Record (REI/MAR) 86-02-03-01; RC Pump Vibration Monitoring Upgrade Upgrade FCN 5A and 10A; and AR-403, PSA-H Annunciator Response, Revision 5.

Alert and danger setpoints were established via REI/MAR 86-02-03-01, FCNs 5A and 10A. The vibration monitors alarm on the main control board annunciators. Procedure AR-403, Revision 5, which is the PSA-H annunciator response procedure for reactor coolant pump vibration high (Window H-2-3), requires the operators to check the monitors to verify that actual vibration levels are in the indicated danger range, to check both vibration probes, and to contact site Nuclear Engineering Services. SP-300, Revision 92, instructs the operators to notify the site Nuclear Engineering Services if any vibrations are in either the indicated alert or danger range. Additionally, the cognizant site nuclear engineer reviews the RC pump seal data for trending.

Sufficient controls and monitoring criteria govern the RC pump and seals to ensure a high degree of operational attention. This item is closed.

- r. (Closed) VIO 302/86-21-01: Failure to Follow Licensed Operator Qualification Training Program Regarding Nine Individuals who Received Unsatisfactory Simulator Performance Ratings

The licensee reevaluated the nine individuals as documented in a memo dated June 27, 1986. The individuals were reevaluated on the simulator and satisfactorily completed all previously failed scenarios. The inspector verified that TDP-203, Revision 7, adequately clarifies the requirements and responsibilities for special simulator evaluations. This item is closed.

#### 4. Closeout of Inspector Followup Items (92701)

- a. (Closed) IFI 302/83-04-02: Inconsistencies Between FSAR Section 12D and 10 CFR 55 Appendix A

(Closed) IFI 302/83-04-03: Inconsistencies Between TDP-203, FSAR Section 12D and 10 CFR 55 Appendix A

These two Inspector Followup Items involved inconsistencies between the Licensed Operator Training Program as identified in the FSAR, 10 CFR 55 Appendix A, NUREG 0737, a March 20, 1980 letter from H. Denton, and the licensee's procedures.

In response to significant deficiencies identified in the area of licensed operator requalification training identified during inspection 302/85-01 in January of 1985, the licensee has made major revisions to the FSAR Section 12C and the Licensed Operator Requalification Program, and to related procedures. The licensee also identified in excess of 500 commitments in the area of training and implemented actions to ensure that any of these commitments which had been deleted from applicable programs, the FSAR, or training procedures were restored.

The inspector compared FSAR Revision 8 to Appendix 12C, Licensed Operator Requalification Training Program Description, dated September 1, 1986, the requirements in 10 CFR 55 Appendix A, NUREG 0737 Item I.A.1.2, and Training Department Procedure TDP-203, Licensed Operator Requalification Program, Revision 7. The requirements in these documents appeared to be consistent in areas such as examination grading criteria, required simulator and plant control manipulations, and operator evaluation criteria. The resolution of specific deficiencies in the Licensed Operator Requalification Program and related procedures are addressed elsewhere in this Inspection Report, (paragraphs 3.d, 3.f, and 3.g).

Based on this above information, the item is closed. The information above is also applicable to the closure of Violation A of EA 86-37.

b. (Closed) IFI 302/85-01-12: Inspector Concerns on General Employee Training

Inspection Report 85-01 identified concerns with General Employee Training (GET) which included the absence of a plant policy on reporting potential problems to QA, lack of direction on reporting safety problems, and readministering the identical test to individuals failing portions of GET testing.

Inspection Report 86-21 documented the following observations with regards to GET training:

- (1) Training has been revised to reflect plant policy for when and how individuals should report observed potential problems to Quality Assurance.
- (2) Training has been revised to reflect which plant organization should be notified if a safety concern is identified.

The final concern pertained to a lack of diversification on the GET examinations. The inspector reviewed GET examinations 9, 10, and 11 and found them to exhibit a degree of diversification sufficient to ensure testing of course knowledge.

Based on this information, the item is closed.

A proposed revision to TDP-106, Examination Preparation, Administration, and Grading, Revision 4, will stipulate that no more than 50% of remedial retest or makeup examination questions may be from the original exam. Furthermore, the proposed revision requires that successive examinations given within 3 months of each other and covering the same material should not contain more than 35% of the questions on the previous exam. If approved, these restrictions will help to ensure diversification sufficient for adequate testing of training comprehension by individuals.



- c. (Closed) IFI 302/86-04-01: Evaluate Cause of RPS Low Pressure Channel B Trip & Conduct Instrument Calibration

On January 1, 1986, a failure of Reactor Coolant Pump 1A and subsequent reactor trip were reported to the NRC under 10 CFR 50.72. NRC inspectors reviewing safety parameter display (SPDS) recall data noted that reactor protection system (RPS) low pressure channel B tripped at approximately 45 seconds into the event. The post trip review recognized the trip, but did not address the lack of obvious indication that the plant pressure had attained a point which would have initiated the low pressure trip. The inspectors were unable to find any licensee evaluation to determine the specific cause of this occurrence, and their review of selected documentation including the Reactor Trip Report and Plant Review Committee Restart Review failed to indicate that such an evaluation was to be performed. The licensee had been requested to supplement their next scheduled RPS calibration with a detailed evaluation to determine the specific cause of this occurrence.

The licensee provided the inspectors with copies of instrument calibration sheets for the reactor protection system and SPDS recall data points, including pressure readings during the transient. The inspectors reviewed Surveillance Procedure SP-110, Reactor Protection System Functional Test, and SP-112, Reactor Protection System Calibration. In both cases, the bistable and the pressure transmitter were found and left in an acceptable condition. The data from the recall system was also reviewed and it was determined that there was in fact a low enough pressure to trip the "B" channel on RCS low pressure.

Based on this information, the item is closed.

- d. (Closed) IFI 302/86-04-02: Evaluate Other RCPs with Respect to the Failure of RCP 1A

NRC inspectors had noted that the failure of reactor coolant pump (RCP)-1A in January 1985 (Paragraph 4.c) necessitated further evaluation of the other RCPs.

The licensee's response was to change out the rotating assemblies of all four reactor coolant pumps during the winter and spring of 1986, and rebuild the seal packages. The inspector reviewed the completed work packages that were used to perform the work. No problems were identified.

Based on this information, the item is closed.

- e. (Closed) IFI 302/86-04-04: Inspector Concerns Pertaining to Operator Response to Abnormal Events

NRC evaluation of operator actions during the transient of the January 1, 1986, reactor coolant pump failure event determined that operators performed immediate actions and some followup actions without use of open procedures. Three examples of failure to follow written approved procedures were identified, and Violation 86-04-03 was issued (Paragraph 3.p). The licensee was therefore requested to clarify the intended performance of operator actions without the use of open procedures during the early phase of an event, and to establish that operators respond in a similar manner during simulator examinations conducted by either the licensee or the NRC.

The inspector confirmed via interviews with licensee instructors that the operators are instructed to perform all immediate and some followup actions in the early phases of an actual event without the use of open procedures. The operators are further required to subsequently use the procedures to verify that all requisite actions were taken and to continue with required followup actions.

Based on this information, the item is closed.

- f. (Closed) IFI 302/86-04-06: Review Quality Control Inspection Documentation of Safety-Related Pipe Supports Reinstalled After Relief Valve Testing

Inspection 86-04 identified that surveillance procedure SP-602, ASME Section XI Relief Valve Testing, Revision 11 directed the reinstallation of piping and supports after secondary relief valve testing with no reference to post-installation inspection for safety related supports. It was not determined whether safety-related pipe supports had been removed or disassembled and reinstalled or reassembled without required quality control inspections.

The inspectors reviewed Maintenance Procedure MP-132, REV II Erection of Piping, and the approved Revision 12 of SP-602. The approved revision of SP-602 requires that if any piping or supports have been removed that they be reinstalled per the guidelines stipulated in MP-132. These guidelines will ensure that the original erection requirements are met.

Based on this information, the item is closed.

- g. (Closed) IFI 302/86-04-07: Assess Testability & Inservice Test Program Coverage of Emergency Feedwater Valve EFV-14, which is in a Fire Resistant Sealed Enclosure

IFI 302/86-04-07 involved the adequacy of inservice testing of Emergency Feedwater Valve EFV-14. Valve EFV-14 was required to be inspected once every two years to verify that valve operation is accurately indicated, pursuant to ASME Section XI paragraph IWV-3300. However, EFV-14 is enclosed in a fire resistant sealed enclosure pursuant to 10 CFR 50 Appendix R. In order to perform a local stroke verification, the fire barrier would have to be removed.

In response to this item the licensee requested the NRC to grant relief for the valve in question from ASME test requirements. The inspector reviewed the relief request along with a letter from the Commission granting interim relief and allowing the licensee to implement the proposed program. This interim relief was granted until such time that the staff can complete a detailed review.

Based on this information, the item is closed.

- h. (Closed) IFI 302/86-21-02: Requalification Program Lacked Formal Mechanism to Notify Individual and Document Removal from Duty as a Result of Unsatisfactory Requalification Evaluation

TDP-113, Remedial Training Program, Revision 3, includes a form to provide the necessary notification and documentation of when an operator has been removed from duty and when he has completed remedial training and is reinstated. The inspectors reviewed selected training records and verified that TDP-113 is being followed.

Based on this information, the item is closed.

- i. (Closed) IFI 302/86-21-03: Equivalency of the Instant SRO Training Program to the FSAR Cold License Training Program

The licensee's Quality Program Deficiency Report (QPDR) 85-QAS-0116 had indicated closure of an item associated with the Instant SRO Training Program. Associated with the QPDR, NRC Inspectors had expressed a concern that Instant SRO license candidates had been tested at the RO level, and that certain training requirements in the SRO cold license training had not been included in the "Instant SRO" training.

In a submittal to the NRC dated October 23, 1986, the licensee provided an evaluation of the Instant SRO Training Program relative to the Cold License Training Program contained in the FSAR. The submitted program and evaluation were compared by the NRC to (1) the cold license program in FSAR Appendix 12B, Revision 6, (2) the Standard Review Plan, and (3) NUREG 0737 Item I.A.2.1. The program was determined to be adequate. Specific areas of training that had appeared to be missing from the instant SRO training were determined to be contained in other segments of the training program.



In addition, Training Department Procedures TDP-106, Examination Preparation, Administration, and Grading, and TDP-202, Replacement Operator Training Program, have been revised to ensure that license candidates are tested at the proper level (RO or SRO) for the license sought. A "caution" statement in Section 6.1.1.2 of TDP 202 requires that the instant SRO candidate shall complete the same training as the SRO Upgrade candidate.

Based on this above information, the item is closed.

- j. (Closed) IFI 302/86-21-04: Requested Licensee Review of Replacement Operator Program Records for Unsatisfactory Simulator Performance

In an Interoffice Correspondence dated September 11, 1986, the licensee documented a review of simulator evaluations for the December 1984 and August 1986 groups of replacement operator trainees. Additional problems, as identified in Violation 302/86-21-01, were not found. The inspectors reviewed three randomly selected records from the 1986 replacement operator group and verified that evaluations and retraining were conducted as required.

Based on this information, the item is closed.

During the review of the simulator evaluations, an example was identified where the evaluation of the simulator instructor disagreed with that of the FPC designated evaluator for one replacement operator candidate. The candidate was reevaluated and performed satisfactorily, but the procedure governing replacement operator training, TDP-202, Replacement Operator Training Program, Revision 5, does not address which evaluation takes precedence.

Procedure TDP-202 allows the Nuclear License Operator Training Supervisor (NLOTS) to designate an evaluator for simulator performance. The inspector expressed concern to the licensee that these designees must meet the requirements of NUREG 0737 Item I.A.2.3.

- k. (Closed) IFI 302/86-21-05: Implementation of FSAR Chapter 12 Appendix C Requirements for Annual Drills and Semi-annual EP/AP Walkthroughs

The requalification program described in Revision 8 of the FSAR, Chapter 12 Appendix C (Revision 2 of the Requalification Program) requires that licensed operators participate in one plant drill annually, and walkthrough one major emergency procedure (EP) or abnormal procedure (AP) semi-annually.

These requalification program requirements have been implemented in TDP-203, Licensed Operator Requalification Training Program, Revision 7. The required annual drill participations are documented in each individual's quarterly review record and the EP or AP walkthroughs are documented in each individual's semi-annual evaluation report. The inspectors reviewed selected training records for licensed operators and verified that their participation in the required drills and walkthroughs was documented according to TDP-203.

Based on this information, the item is closed.