

APPENDIX B

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-498/88-54
50-499/88-54

Operating License: NPF-76
Construction Permit: CPPR-129

Dockets: 50-498
50-499

Licensee: Houston Lighting and Power Company (HL&P)
P.O. Box 1700
Houston, Texas 77001

Facility Name: South Texas Project (STP)

Inspection At: STP, Bay City, Texas

Inspection Conducted: August 22-26, 1988

Inspector:

Gregory A. Pick
G. A. Pick, Reactor Inspector, Operational
Programs Section, Division of Reactor
Safety

September 23, 1988
Date

Accompanied
By:

D. T. Nelson, TTC Instructor

Approved:

Joseph W. Gagliardo for
J. W. Gagliardo, Chief, Operational Programs
Section, Division of Reactor Safety

September 23, 1988
Date

Inspection Summary

Inspection Conducted August 22-26, 1988 (Report 50-498/88-54 and 50-499/88-54)

Areas Inspected: Routine, unannounced inspection of plant procedures and operating procedures, operator readiness training, and operational staffing.

Results: Within the three areas inspected, one violation was identified (inadequate abnormal operating procedures, paragraph 2).

DETAILS1. Persons ContactedHL&P

- *S. L. Rosen, General Manager, Operations Support
- *J. T. Westermeier, Project Manager
- *J. E. Geiger, General Manager, Nuclear Assurance
- *M. R. Wisenburg, Plant Superintendent, Unit 1
- *J. N. Baily, Engineering and Licensing Manager, Unit 2
- *G. L. Parkey, Plant Superintendent, Unit 2
- +*S. J. Eldridge, Manager, Operations Support
- +*J. W. Loesch, Manager, Plant Operations
- *W. L. Giles, Manager, Unit 2 Operations
- *J. A. Slabinski, Operations, Quality Control (QC) Supervisor
- *S. M. Dew, Operations Support, Manager
- *F. L. Boswell, Procedure Development, Supervisor
- *W. W. Trujillo, Project Quality Assurance Supervisor
- *T. L. Quirk, General Supervisor, Records Management
- *G. E. Vaughn, Vice President, Nuclear Operations
- *S. N. Head, Supervisor, Licensing Engineering
- + K. M. O'Gara, Plant Compliance Section (PCS), Engineer
- + J. D. Phillips, PCS, Engineer

NRC

- *D. M. Hunnicutt, Senior Reactor Inspector, RIV
- *D. L. Garrison, Senior Resident Inspector, STP

Other personnel contacted included technicians, engineers, administrative aides and licensed operators.

- *Attended exit meeting held on August 26, 1988.
- +Attended post exit meeting held on August 26, 1988.

2. Procedures Review (42400 and 42450)

This inspection assessed the licensee's procedures for adequate administrative controls, technical adequacy, and compliance with regulatory requirements. Procedures and programs in the below listed areas were selected for review:

- o Plant
- o Operating
- o Off-Normal Operating

a. Plant Procedures

(1) Administrative Controls

The NRC inspectors reviewed administrative procedures to ascertain whether responsibilities had been assigned to appropriate personnel. Assignment of responsibilities ensured that a method was in place to assure that plant procedures will be reviewed, updated, and approved as required and assured that the revision process included provisions for 10 CFR 50.59 considerations.

Administrative procedures reviewed were as follows:

- OPGP03-ZA-0002, Revision 13, "Plant Procedures"
- OPGP03-ZA-0003, Revision 8, "License Compliance Review"
- OPGP03-ZA-0004, Revision 9, "Plant Operations Review Committee"
- OPGP03-ZA-0007, Revision 4, "Classification of Procedures"
- OPGP03-ZA-0010, Revision 11, "Plant Procedure Compliance, Implementation, and Review"

These procedures defined the procedure revision process for all plant procedures with the exception of plant organization, plant policies, and emergency operating procedures. They defined the responsibilities of personnel to ensure that each procedure was reviewed within a 24-month interval and was revised, if required. The procedures utilized were common to both Unit 1 and Unit 2.

(2) Standing Orders, Night Orders, and Operating Logs

The NRC inspectors determined that these activities had the same controls for both Unit 1 and Unit 2. Administrative controls were provided for the preparation of operating logs, shift turnover activities, and log reviews.

The standing orders applied to either Unit 1, Unit 2, or both. Each standing order specified its applicability. Night order books resided separately in each control room and applied only to that unit. A mechanism existed for the issuance, distribution and review of both standing orders and night orders. Limitations were established regarding the type of instructions, which may be issued as standing orders or night orders.

(3) Field Change Requests

Procedure OPGP03-ZA-0002, "Plant Procedures," was revised after the Unit 1 procedure inspection in 1987. The revision, in part, limited the number of permanent field change requests (FCRs) to

three before a revision was required to be implemented. During conduct of this inspection, the NRC inspector noticed that several of the procedures selected for review had more than three permanent FCRs outstanding against the procedure.

Discussions with the licensee indicated that after a procedure had three outstanding FCRs it was placed in the review process in order to get revised. The review process began when the responsible group marked up the original to get the changes incorporated. During this portion of the change process, the procedure tracking database did not indicate that a change was being made; therefore, more field changes could be implemented against the procedure before the new revision was issued. The only way to determine compliance with Procedure OPGP03-ZA-0002 at the time of the inspection would have been to request the procedure status from each responsible department. This will remain an open item (498;499/8854-01) awaiting further NRC review of this process.

Additionally, Nuclear Assurance Audit Report 88-28 (ST-HS-HS-9608), dated June 22, 1988, identified as Deficiency Report (DR) 88-078, the same concern as the NRC inspector.

(4) Procedure Development Group

The NRC inspector reviewed the activities of the procedure development group (PDG). As of the date of the inspection, 55 percent of the required procedures had been approved. However, 80 percent of the required operations procedures had been approved. Procedures are approved using either the review cycle, which includes the onsite safety committee, or through the conversion of Unit 1 procedures as described in OPGP03-ZA-0002, "Plant Procedures."

b. Operating Procedures

This area of the inspection was conducted to confirm that general plant operating procedures and that procedures for startup, operation, and shutdown of safety-related systems were prepared and approved to control safety-related operational activities.

A sample review of plant operating procedures in the above categories was conducted to verify that the appropriate format was used, that the Unit 2 and Unit 1 procedures were similar (if they had gone through the conversion process), and that selected procedures were technically adequate to accomplish the stated purpose. The results of the reviews in each category are documented below:

(1) General Plant Operating Procedures

The inspection was conducted in order to verify that the conversion of Unit 1 to Unit 2 procedures was being accomplished in accordance with STP Procedure OPGP03-ZA-0002, Revision 13, "Plant Procedures," Step 2.2.2.

- (a) The following procedures had not been issued as of August 26, 1988:

<u>Procedure No.</u>	<u>Revision</u>	<u>Title</u>
2POP03-ZG-0004	0	"Reactor Startup"
2POP03-ZG-0008	0	"Power Operations"

- (b) Procedures reviewed for consistency between the units and for technical content are listed below:

<u>Procedure No.</u>	<u>Revision</u>	<u>Title</u>
1POP03-ZG-0001	9	"Plant Heatup"
2POP03-ZG-0001	0	"Plant Heatup"
1POP03-ZG-0003	5	"Secondary Plant Startup"
2POP03-ZG-0003	0	"Secondary Plant Startup"
1POP03-ZG-0007	5	"Plant Cooldown"
2POP03-ZG-0007	0	"Plant Cooldown"

(c) NRC Inspector Observations/Concerns

- 1) 1POP03-ZG-0001, Revision 9, "Plant Heatup"
2POP03-ZG-0001, Revision 0, "Plant Heatup"
 - ° Inside the body of Procedure 2POP03-ZG-0001, 30 procedures were identified that must be available to complete all applicable steps. However, of these 30 procedures, only 15 had been approved, 12 were in the writing or approval process and 3 had not been verified as being complete or incomplete.
 - ° The procedure check lists were inconsistent between the Unit 1 and Unit 2 procedures. Eight procedures were missing from the Unit 2 procedure's mode check lists. One procedure was moved from Procedure 2POP03-ZG-0001 mode 4 to the mode 3 check lists.
- 2) 1POP03-ZG-0003, Revision 5, "Secondary Plant Startup"
2POP03-ZG-0003, Revision 0, "Secondary Plant Startup"

- The inspector noted different valve numbers between the Unit 1 procedure and the Unit 2 converted procedure. Valve numbers in 1POP03-ZG-0003, Step 8.6, were designated 1-FW-0003, -5, -1, and 0520, while 2POP03-ZG-0003 referred to these valves as 2-CD-0144, -145, -146, and 0517.
 - Eight FCRs issued against 1POP03-ZG-0003, Revision 5 had been identified, but not all of these FCRs had been inserted into the 2POP03-ZG-0003, Revision 0, procedure.
- 3) 1POP03-ZG-0007, Revision 5, "Plant Cooldown"
2POP03-ZG-0007, Revision 0, "Plant Cooldown"
 - The NRC inspector found precautions missing between the procedures. Procedure 1POP03-ZG-0007, Revision 5 contained precautions in Steps 4.10 and 4.11, while these precautions were omitted from the Unit 2 procedure.
 - There were breaker designation disagreements between the procedures. Procedure 1POP-03-ZG-0007, Step 6.5 addresses the disabling of a centrifugal charging pump (CCP) by opening E1C-4 for CCP1A and opening the E1A-9 for the CCP1B on Unit 1, while Procedure 2POP03-ZG-0007 opened E2A-9 for CCP2A and E2C-4 for CCP2B.
 - There was disagreement in the depth of operator guidance between procedures. For example: Procedure 1POP03-ZG-0007, Step 6.9 states, in part, for Valve 1CV0198, turn and then lock in place to limit reactor makeup water flow to 125 gallons per minute (gpm), while the Unit 2 procedure left out the words, "lock in place." In addition, the note that followed Step 6.9 in the Unit 1 procedure did not appear in the Unit 2 procedure.
 - The FCR issued against 1POP03-ZG-0007, Revision 5, had not been issued to the 2POP03-ZG-0007, Revision 0 procedure.
- 4) A general concern identified that the FCRs were not being applied to both Unit 1 and Unit 2 procedures at the same time, even though licensee representatives stated that both units were virtually identical. In addition, procedures were found to have as many as

eight FCRs issued against the last revision, which was not in compliance with existing guidance of Procedure OPGP03-ZA-0002, Revision 13, "Plant Procedures," Step 11.3.1.d which states, in part, that after three FCRs have been generated the procedure shall be revised. This was another example of Open Item 498;499/8854-01.

(2) Procedures For Startup, Operation, and Shutdown of Safety-Related Systems

(a) Procedures Reviewed:

<u>Procedure No.</u>	<u>Revision</u>	<u>Title</u>
1POP02-SI-0001	3	"Safety Injection Accumulators"
2POP02-SI-0001	0	"Safety Injection Accumulators"
1POP02-SI-0003	0	"Filling the Reactor Cavity using the Safety Injection System"
2POP02-SI-0003	0	"Filling the Reactor Cavity using the Safety Injection System"
1POP02-AF-0001	7	"Auxiliary Feedwater"
2POP02-AF-0001	0	"Auxiliary Feedwater"
1POP02-RS-0001	3	"Rod Control"
2POP02-RS-0001	0	"Rod Control"
1POP02-RC-0003	6	"Filling and Venting the Reactor Coolant System"
2POP02-RC-0003	0	"Filling and Venting the Reactor Coolant System"
1POP02-SP-0001	3	"Solid State Protection System"
2POP02-SP-0001	0	"Solid State Protection System"

(b) NRC Inspector Observations/Concerns

- 1) The NRC inspector compared the procedures for consistency in the conversion from Unit 1 to Unit 2. They were found to be identical.

- 2) The NRC inspector noted some minor typographical errors. Procedure 1POP02-SI-0001, Revision 3, Step 8.0 refers to TS LCOA and 2POP02-SI-0001, Revision 0, refers to TS LCOA. Both procedures intended to refer to TS LCO.
- 3) 1POP02-AF-0001, Revision 7, "Auxiliary Feedwater"
 - ° Seven FCRs had been issued on this procedure, but FCR No. 2 (88-1001) and FCR No. 3 (88-1098) were missing from the procedure.
- 4) The NRC inspector noted that the reference diagrams of these procedures had revision numbers. There was no method by which the reference section procedure revision numbers could easily be revised when revising the procedure after three FCRs had been issued; hence, this would allow the reference sections to refer to the wrong revision of a procedure. This was another example of Open Item 498;499/8854-01.

c. Off-Normal Operating Procedures

The NRC inspector reviewed selected off-normal operating procedures to verify that they were in the required format, that the Unit 2 procedures had been converted properly and discrepancies identified, and that selected procedures were technically adequate to perform their designated function.

(1) Procedures Reviewed

<u>Procedure No.</u>	<u>Revision</u>	<u>Title</u>
1POP04-AC-0003	0	"Loss of Closed-Loop Auxiliary Cooling Water Off-Normal"
2POP04-AC-0003	0	"Loss of Closed-Loop Auxiliary Cooling Water Off-Normal"
1POP04-AE-0001	4	"Main or Auxiliary Transformer Lockout"
2POP04-AE-0001	0	"Main or Auxiliary Transformer Lockout"
1POP04-AE-0003	3	"Standby Transformer Lockout"
2POP04-AE-0003	0	"Standby Transformer Lockout"
1POP04-AE-0005	0	"Ground Fault Indication and Isolation"

2POP04-AE-0005	0	"Ground Fault Indication and Isolation"
1POP04-CV-0001	3	"Loss of Component Cooling Water"
2POP04-CV-0001	0	"Loss of Component Cooling Water"
1POP04-CV-0003	1	"Emergency Boration"
2POP04-CV-0003	0	"Emergency Boration"
1POP04-RC-0002	3	"Reactor Coolant Pump Off-Normal"
2POP04-RC-0002	0	"Reactor Coolant Pump Off-Normal"
1POP04-RC-0004	2	"Steam Generator Tube Leakage"
2POP04-RC-0004	0	"Steam Generator Tube Leakage"
1POP04-RP-0001	3	"Loss of Automatic Pressurizer Pressure Control"
2POP04-RP-0001	0	"Loss of Automatic Pressurizer Pressure Control"
1POP04-RP-0002	0	"Loss of Automatic Pressurizer Level Control"
2POP04-RP-0002	0	"Loss of Automatic Pressurizer Level Control"
1POP04-RH-0001	2	"Loss of Residual Heat Removal"
2POP04-RH-0001	0	"Loss of Residual Heat Removal"
1POP04-NI-0003	1	"Power Range Nuclear Instrument Malfunction"
2POP04-NI-0003	0	"Power Range Nuclear Instrument Malfunction"

(2) NRC Inspector Observations/Concerns

- (a) The NRC inspector compared the above procedures for consistency in the conversion from Unit 1 to Unit 2. The reviewed procedures appeared to be identical. The following procedures, however, were found to be totally different and unusable from one unit to the next:

1POP04-AC-0003, Revision 0 "Main or Auxiliary Transformer Lockout"

2POP04-AC-0003, Revision 0, "Main or Auxiliary Transformer Lockout"

1POP04-AE-0001, Revision 4, "Standby Transformer Lockout"

2POP04-AE-0001, Revision 0, "Standby Transformer Lockout"

- (b) The following off-normal operating procedures were selected by the NRC inspector for technical review:

<u>Procedure No.</u>	<u>Revision</u>	<u>Title</u>
2POP04-NI-0003	0	"Power Range Nuclear Instrument Malfunction"
2POP04-CV-0003	0	"Emergency Boration"
2POP04-RH-0001	0	"Loss of Residual Heat Removal"
2POP04-RP-0001	0	"Loss of Automatic Pressurizer Pressure Control"
2POP04-RP-0002	0	"Loss of Automatic Pressurizer Level Control"

The NRC inspector noted inconsistencies in the symptoms of the procedures. The symptoms should have included the important groups of annunciation/alarms, which would indicate that specific off-normal conditions as described in Procedure OPOP01-ZA-0007, Revision 11, "Off-Normal Procedures Writers Guide," Step 3.4. For example Procedure 2POP04-NI-0003, Revision 0, "Power Range Nuclear Instrumentation Malfunction," only listed the power range channel deviation alarm and omitted the nuclear instrumentation system power range tilt or flux deviation, upper detector flux deviation, and lower detector flux deviation alarms.

(c) NRC Inspector's Procedure Specific Comments

- 1) 1; 2POP04-NI-0003, Revision 0, "Power Range Nuclear Instrumentation Malfunction"

o The NRC inspector noted that Section 3.0, "Automatic Actions," of the above procedure did not include all automatic actions as required by OPOP01-ZA-0007, Revision 1, "Off-Normal Procedures Writers Guide." Step 3.5 of the Writers Guide stated, in part, that all automatic

functions which are caused by the initiating event are to be listed. An example of an automatic action not listed was inward rod motion, if the rod control system was selected to auto.

- o The NRC inspector noted a lack of guidance in the body of the procedure for the operator to ensure that all reactor protection system trips were inserted in compliance with the TS. Instead, the operator had to leave the procedure and go to the TS. TS provide the operator with a required number of channels, but the TS do not guide the operator as to proper actions. The guidance failed to comply with the requirements of Step 3.7 of Procedure OPOP01-ZA-0007 in that it referred the operator to the TS and did not give guidance. This is an example of an apparent violation (498/8854-02) due to insufficient guidance in the body of the procedure.

- o Procedure 1; 2POP04-NI-0003, Step 5.6 stated, "Notify I&C of the malfunction." The NRC inspectors questioned the licensee on what activities the instrument and control (I&C) technician was going to accomplish. The NRC inspector was informed that I&C would obtain a maintenance work request (MWR) and have the shift supervisor approve the initiation of work in accordance with Procedure 1PSP05-NI-0041, "Power Range Neutron Flux Channel Calibration." If problems were encountered during the course of the I&C calibration, the technician was to notify the shift supervisor. During the NRC inspector's review of Procedure 1PSP05-NI-0041, it was determined that the procedure failed to trip all of the required functions. The procedure did not place in a tripped condition the proper channels for the positive rate and negative rate trips. This guidance failed to meet the requirements of Procedure OPOP1-ZA-0007, Step 3.7.

TS 6.8.1 requires that procedures shall be established, implemented, and maintained covering . . . a. The applicable procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Section 5, states, in part, that procedures for abnormal, off-normal or alarm conditions be established. Station

Procedure OPOP01-ZA-0007, "Off-Normal Procedures Writers Guide," Step 3.5 required that Section 3.0, of off-normal procedures automatic actions, list all automatic functions that are caused by the initiating event. Step 3.6 required Section 4.0 of off-normal procedures, "Immediate Operator Action," list steps that must be performed to assure stabilization of the event. Step 3.7 required that Section 5.0, in off-normal procedures, "Supplementary Actions," describe the actions to be taken after the initiating event. It further stated that supplementary actions could be in the form of a list of items to check to determine what caused the event, or could have given steps to further stabilize or recover from the event.

The failure of Procedures 1; 2POP04-NI-0003 to include supplementary steps to require actions that would assure all required functions were placed in a safe condition, and to verify that all listed functions were tripped is an apparent violation (498/8854-02) of the requirement stated above. Additionally, Step 5.2 contained a reference to an incorrect TS. The step referred to TS 3.3.1 when the correct reference should have been TS 3.2.3/4.

- 2) 2POP04-CV-0003, Revision 0, "Emergency Boration"
 - There was a lack of guidance for the operator as to how much boric acid must be injected into the reactor coolant system. Steps 5.3.2 and 5.3.3 states, borate 4 parts per million (ppm) and 228 ppm, respectively, depending on the abnormal condition. A nomograph was required to be used. The procedure would be more effective if the worst case conditions, end-of-life, were utilized and the numbers were provided in useful units, such as gallons-per-minute.
- 3) 2POP04-RH-0001, Revision 0, "Loss of RHR"
 - There was inconsistency between the operator actions required by different procedures. Step 5.4.1.2 of this procedure required the operator to open the refueling water storage tank valves to the suction of the centrifugal charging pumps with no reference to closing the volume control tank outlet valves. However, Procedure 2POP04-CV-0003, Step 5.2.2 required the

operator to open the refueling water storage tank valves to the suction of the centrifugal charging pumps and to close the volume control tank outlet valves.

- There was an apparent lack of operator guidance in the symptoms section since no alarms were listed.
- 4) 2POPO4-RP-0001, Revision 0, "Loss of Automatic Pressure Control"
- There was incomplete guidance given to the operator to ensure conformance to TS 3.4.4. Step 4.3.2 directed the operator to close the associated power operated relief valve block valve but did not direct the operator to remove power, which is a TS requirement. This was contrary to the requirements of Procedure OPOP01-ZA-0007, Step 3.6, which required a list of the operator actions necessary to stabilize the event. This is another example of apparent violation (498/8854-02).
 - There was a lack of guidance stated in the body of the procedure for the operator to ensure that the reactor trip bistables had been tripped by I&C as specified in Step 5.3. The procedure was incomplete in that it did not have the operator, (the person responsible) verify that all actions were taken to assure the prescribed plant configuration was maintained. This was contrary to the guidance specified in Procedure OPOP01-ZA-0007, Step 3.7, and is another example of apparent violation (498/8854-02).

(3) Summary

- (a) There existed inconsistencies between the Unit 1 and Unit 2 procedures selected for review. The NRC inspector reviewed 13 procedures and found that 2 of the procedures were completely different and found 11 were identical.
- (b) There were technical deficiencies in both Unit 1 and Unit 2 abnormal procedures. In the five procedures selected for technical review, the NRC inspector was concerned with the following:

- Symptoms between different procedures were inconsistent. Some procedures listed the annunciation that would alert the operator while other procedures listed no annunciation.
- Some procedures did not address the total number of steps needed to place the plant in conformance with TS. Additionally, as described earlier some steps were not detailed enough to accomplish the required task. The procedure would send the operator to outside documents which specified requirements and not actions.
- There were no procedures for either Unit 1 or Unit 2 related to temperature instrument failures.
- Technical content errors and procedural problems were identified in four of the five procedures reviewed. Two of the four procedures had errors severe enough to be in noncompliance with the off-normal procedures writers guide.

3. Operator Readiness Training (41400)

This area was inspected to determine what training was being provided to the Unit 2 licensed operators who had not been given the opportunity to gain experience on the Unit 1 reactor plant and to determine the effectiveness of the training if any provided.

The NRC inspector determined that the training being provided was related to Unit 1 in all areas. Simulator training used controlled copies of Unit 1 procedures. Hot license training and licensed operator requalification training used Unit 1 as a basis; however, due to the close similarity between the units, the Unit 2 and Unit 1 operators were being trained on the design and operational differences between the units.

Training of the operators in this manner appeared to be in agreement with the intent of the requirements specified in NRC Examination Standard (ES) ES-106, Revision 4, "Administration of Examinations at Multiunit Power Stations," dated May 26, 1987. This standard specified evaluation topics for examination of reactor operators and senior reactor operators (i.e., information pertinent enough to be acquired and tested).

An evaluation/justification was conducted and summarized the differences as required by the standard in the following areas: (1) facility design and systems relevant to control room personnel, (2) Technical Specifications, (3) procedures, primarily, abnormal and emergency operating procedures, (4) control room design and instrument location, (5) operational characteristics.

The evaluation/justification of the differences in the above five areas was provided by Bechtel Engineering and Westinghouse to the Nuclear Plant Operations Department by memorandum dated May 3, 1988, (ST-HS-P2-622) from J. T. Westermeier to W. H. Kinsey on "Dual Licensing of Operations - NUREG 1021." A second memorandum was issued August 3, 1988, (ST-HS-P2-802) on the same subject and involved the same principals. A third memorandum on design differences was planned to be forwarded on October 6, 1988. At the nuclear plant operations department's request, and to meet the requirements of ES-106, the training department issued Lesson Plan LOT 203.21, "Differences Between Unit 1 and Unit 2," dated June 15, 1988. This training was provided to both Unit 1 and Unit 2 licensed operators during requalification Cycle 803 over the period June 22 through July 23, 1988.

From discussion with employees in the training department, the NRC inspector determined that the training department intended to train on the unit differences as they were identified. This will be an open item (498/8854-03; 499/8854-02) awaiting verification that the design differences had been taught as specified.

The NRC inspector reviewed the Design Difference Lesson Plan LOT 203.21. The lesson plan was well developed and technically adequate.

Additionally, the NRC inspector determined that during the midshift for each of the Unit 2 operating crews, they would spend the 5 day shift on 12 hour days operating Unit 1. Review of on-the-job qualification journals for three of the Unit 2 reactor operators confirmed that the operators had performed and/or simulated operation of a majority of the systems during their Hot License Training.

No violations or deviations were identified in the review of this program area.

4. Operational Staffing (36301)

This inspection was conducted to verify that the operations staff positions were filled with qualified personnel.

The NRC inspector determined that the licensee's organizational structure, including technical support and the Quality Assurance (QA)/Quality Control (QC) function was as proposed in the latest FSAR Amendment. Additionally, the NRC inspector determined that selected managers, supervisors, engineers, technicians, and QA auditors/QA inspectors met or exceeded minimum qualification requirements. The personnel selected for review were part of the Unit 2 organization and support organizations for both Unit 1 and Unit 2. The qualification requirements were specified in the following standards: ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel;" ANSI N45.2.6-1973, "Qualifications of Inspection, Examination, and Testing Personnel for the Construction Phase of Nuclear Power Plants;" and ANSI N45.2.23-1978, "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants."

Documents utilized to verify qualifications of the personnel were the resumes described in the FSAR, personnel qualification files, and a work experience summary. The work experience summary obtained from the Prime computer database, listed the type of experience and years of experience for nuclear plant operations department personnel.

No violations or deviations were identified in the review of this program area.

5. Exit Interview

The inspection scope and findings were identified with those individuals identified in paragraph 1. Subsequent to the exit meeting and after review of additional information, the inspectors informed the selected individuals identified in paragraph 1 of the apparent violation. None of the information reviewed by or provided to the inspector was identified as proprietary by the licensee.