

DUKE POWER COMPANY

CHARLOTTE, N. C. 28242

A. C. THIES
SENIOR VICE PRESIDENT
PRODUCTION AND TRANSMISSION

June 2, 1981 JUN 8 P 2: 03

(704) 373-4249

Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Re: Oconee Nuclear Station
IE Inspection Report
50-269/81-06
50-270/81-06
50-287/81-06

Dear Sir:

Please find attached Duke Power Company's response to Violation Item E of the subject inspection report. Responses to the other items of noncompliance were previously submitted by my letter of May 22, 1981.

Additionally, R. C. Lewis' letter of April 28, 1981, which transmitted the subject inspection report, requested that Duke provide a description of actions taken or planned to resolve Unresolved Items 269, 270, 287/79-09 and -10. With regard to this request, the proposed Revision 19 to the Administrative Policy Manual has been finalized and will become effective on June 30, 1981.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge, executed on June 2, 1981.

Very truly yours,

A. C. Thies

A. C. Thies

FTP/djs
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Duke Power Company

Oconee Nuclear Station

Response to IE Inspection Report 50-269/81-06, -270/81-06, -287/81-06

Violation

- E. 10 CFR 50, Appendix B, Criterion V requires activities affecting quality shall be prescribed by documented instructions, procedures or drawings and shall be accomplished in accordance with these instructions, procedures or drawings. The accepted QA Program, Section 17.2.5 implements this requirement. In addition, Technical Specification 6.4.1 requires that the station be operated and maintained in accordance with approved procedures. The Administrative Procedures Manual (APM), Section 2.5, Qualifications and Training of Personnel, paragraph 2.5.5.1 requires that periodic evaluations be conducted to assure that effectual training techniques are utilized.

Contrary to the above, activities affecting quality were not accomplished in accordance with procedures in that periodic evaluations to assure effectual training techniques have not been accomplished.

This is a Severity Level VI Violation (Supplement I.F).

Response

- 1) Admission or denial of the alleged violation:

This violation is partially correct.

- 2) Reasons for the violation or denial of the violation:

- a) All employees who will work in technical areas affecting quality at Oconee except engineering support personnel complete an extensive, formal training program at the Duke Power Technical Training Center prior to their permanent assignment at the station. In addition, training for Operations personnel (including license preparatory and requalification training) is provided at the Oconee Simulator Training Center. Each discipline taught at these training centers is evaluated at least once per year by a Program Review Committee composed of station, General Office, and Training Center representatives. Each committee provides department-wide input and feedback to the Technical Training Programs. The Program Review Committee system of evaluation was formally established on August 31, 1979. Training administered by outside vendors to Duke personnel at any location is formally evaluated under a separate program. Therefore, the violation as it applies to training given by anyone outside the Oconee Nuclear Station staff is incorrect.
- b) Training techniques administered by the Oconee station staff are not periodically evaluated under a formal, documented system. Informal evaluations have been performed by the station training staff on an irregular, non-documented basis. Therefore, the violation as it applies to training given by the Oconee station staff is correct.

- c) The cited Section 2.5 of the APM is intended to provide instructions for implementation of ANSI Standard N18.1-1971, Selection and Training of Nuclear Power Plant Personnel. This standard states that "the objective of training programs shall be to ensure safe and efficient operation of the facility." If employees perform their jobs satisfactorily and operate the plant safely and efficiently, it can be assumed that the training program is effective. Since all station employees have their performance periodically evaluated by management, this review also serves as an evaluation of the employees' training effectiveness. While training techniques may not be specifically evaluated, overall satisfactory performance of plant employees indicates effectual training techniques are utilized.

3) Corrective actions taken and results:

See (4) below.

4) Corrective actions to be taken to avoid further violations:

Since the wording in the cited paragraph 2.5.5.1 of the APM does not accurately reflect the intent or wording of ANSI N18.1-1971, an evaluation of this paragraph will be made and clarifying changes proposed if appropriate.

5) Date when full compliance will be achieved:

The evaluation noted above will be completed by July 1, 1981.