

DUKE POWER COMPANY
POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

81/7/810 All: 10

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

August 3, 1981

TELEPHONE: AREA 704
373-4083

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

Subject: Oconee Nuclear Station
Inspection Report
50-269/81-06
50-270/81-06
50-287/81-06
Supplemental Responses

Dear Sir:

Your office requested (by letter of July 10, 1981 to Mr. William O. Parker) supplemental responses to Violations C and E of the subject Inspection Reports. Please refer to Mr. Parker's letter of July 6, 1981 for the requested response to Violation C. This response was in two parts, the second part of which was incorrectly labeled as the response for Violation E. The intended response to Violation E, which consists of an evaluation of and possible revision to certain parts of the Administrative Policy Manual (APM), follows.

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.

Response

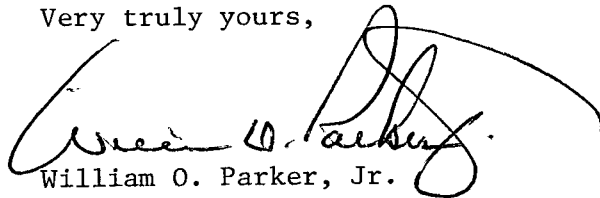
The applicable paragraph (2.5.5.1) has been evaluated as proposed in our response of June 2, 1981.

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In light of various standards and regulatory guidance, it appears that a revision to modify the requirement for periodic evaluations of training techniques would be inappropriate. However, some clarification of the wording of the APM may be considered in the future to accurately reflect the provisions of applicable standards and regulatory guidance. In any event, Duke Power believes that evaluations of training programs can be beneficial to the effectiveness of the training process, and intends to implement such an evaluation program. This program will include establishment of training objectives, evaluation of course content, adequacy of instruction, and the qualification of trainees upon completion of training. This training evaluation program will be operational by January 1, 1982.

Very truly yours,

A handwritten signature in dark ink, appearing to read "William O. Parker, Jr.", with a large, stylized flourish extending from the end of the signature.

William O. Parker, Jr.

SAG/php