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MARTIN, J.B. Region 5, Ofc of the Director

SUBJECT: Responds to NRC evaluation findings of licensed operator
 regualificaiton program.

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J. B. Martin
Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Dear Mr. Martin:

Subject: THE SUPPLY SYSTEM'S RESPONSE TO NRC EVALUATION FINDINGS OF THE
WASHINGTON NUCLEAR PROJECT, UNIT 2 (WNP-2) LICENSED OPERATOR
REQUALIFICATION PROGRAM.

During the period January 29 through February 8, 1990, the Nuclear Regulatory Commission (NRC) conducted a validation review of the WNP-2 Licensed Operator Requalification Program testing materials. Subsequently, during the period of February 27 through March 9, 1990, the NRC conducted a formal program evaluation.

Based on the NRC evaluation and the criteria established in NUREG-1021, ES-601, the WNP-2 Licensed Operator Requalification Program was deemed satisfactory. There were, however, three (3) findings of concern that are addressed below.

FINDING NO. 1:

The quality of the program's written examination and Job Performance Measure (JPM) question bank testing materials were initially inadequate to conduct objective operator examinations. The question banks contained double jeopardy, subjective and open-ended questions to the degree that valid parallel grading determinations between the examiner staffs would have been difficult. Some of the questions were technically inaccurate due to the reference base not being current.

FINDING NO. 1 RESPONSE:

The quality of the written examination and Job Performance Measure (JPM) question bank testing materials will be improved to meet the standards as given in the "Examiners' Handbook for Developing Operator Licensing Examinations".

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(NUREG/BR-0122) and the "Operator Licensing Examiner Standards" (NUREG 1021, ES-601) prior to the next program evaluation cycle.

The written examination will be reviewed completely for double jeopardy, subjective and open-ended questions and rewritten to meet the standards mentioned above. In addition, to meet the latest ES-601 requirement on multiple choice questions, 75% of the written examination question bank will be rewritten into a multiple choice format.

The review of the question bank will also be used to verify the technical accuracy of the questions. The reference base for technical review will be Level I Procedures. The plant procedure manuals in the simulator have been upgraded to Level I.

The question bank has been put on data base. Plant procedures that have changes are reviewed against the questions in the data base. If any PPM changes require a rewriting of the question, it will be done at that time. The question bank will be current when the needs require use of the bank.

FINDING NO. 2:

The WNP-2 Licensed Operator Requalification Program's JPM time validation process is imprecise. Under actual test conditions, approximately 20% of the selected JPM's were completed by the operators in less than half the "validated" estimated time. One safety related JPM required twenty (20) minutes longer to successfully complete than the time estimate given to the operators.

FINDING NO. 2 RESPONSE:

The WNP-2 License Training Department has rewritten the department's license training instruction for JPM development to address this finding. Now, prior to writing down the estimated time for completion on the JPM, it must be validated a minimum of three (3) times under actual test conditions. All of the JPM's will be revalidated prior to the next program evaluation cycle.

FINDING NO. 3:

The NRC Evaluation of WNP-2 Licensed Operator Requalification Program stated that "the licensees operating procedure validation system was not reliable" and also, "the operating procedure validation system was found deficient." This NRC Evaluation then supports these conclusions by stating that of the approximately twenty percent of our safety related procedures sampled, "most of these procedures has some degree of deficiency (erroneous panel labeling, misplaced steps, obscure steps, or insufficient detail), to the extent that correct and timely task performance by licensed operators under actual emergency conditions might be hampered." In addition, two specific examples of

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deficient procedure validation for two safety related procedures were given and are the subject of NRC Notice of Violation 90-09:

FINDING NO. 3 RESPONSE:

The Supply System's response concerning the two specific safety related procedures identified as deficient is contained in our response to NRC Notice of Violation 90-09, dated May 29, 1990 and is not discussed here.

Relative to the NRC concern that procedure validation for WNP-2 operating procedures is inadequate, the following is provided:

1. WNP-2 has been working to establish a Procedure Writer's Guide and an associated procedure Verification and Validation program. Our goal for implementation of this new Writer's Guide and procedure Verification and Validation is July 1990. (Procedure Verification is concerned with written correctness and technical accuracy while procedure validation is concerned with operational correctness and useability.) We are confident that these efforts will ensure high quality, useable procedures for operations personnel.
2. Relative to the existing quality of WNP-2 Operating Procedures, we believe it is important to note that to the best of our knowledge, no instances existed during the NRC examination process, where an operator was not able to correctly perform a given task under actual emergency conditions using existing procedural guidance. This is not based on actual noted performance deficiencies, but on a potential which may exist.

There were other problems identified by the NRC during the program evaluation that were not raised to the level of a "finding". These problems are addressed below:

PROBLEM NO. 1:

The licensee had no formal evaluator training program in place. This was evidenced by evaluators initially making numerous mistakes during the first week of the evaluation process. Typical mistakes included the following:

- o Licensee evaluators not properly cuing operators when a JPM step was not completed by the operator or missing the cue altogether.
- o Telegraphing critical JPM performance steps in the body of the cue presentation.
- o Asking leading JPM questions or rewording the question to the extent that it

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included the answer.

- o Altering JPM questions such that they were reduced in scope to look up exercises.

PROBLEM NO. 1 RESPONSE:

The WNP-2 License Training Department will have an evaluator training program in place prior to the next program evaluation. The qualifications for a requalification instructor already include training as a simulator scenario evaluator. The missing training has been in the area of evaluating operators performing JPM's. The licensee will develop a JPM evaluator training program for its requalification instructors.

PROBLEM NO 2:

Four (4) operating crews were evaluated as satisfactory by the NRC but all crews exhibited some weakness in the competency of communications.

PROBLEM NO. 2 RESPONSE:

The WNP-2 License Training Department will put more emphasis on communications during the teamwork and diagnostic training. We will also continue to put as much emphasis as possible on communications during the regular simulator training.

Very truly yours,



G. C. Sorensen, Manager (MD280)
Regulatory Program

RBB/ng:

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