

WNP-2

LICENSED OPERATOR REQUAL PROGRAM

CORRECTIVE ACTION PLAN

Rev. 7

August 6, 1991

SUMMARY OF CHANGES SINCE LAST REVISION

Short Term Actions:

Item S4-4	Status Update
Item S5-4	Status Update
Item S6	Status Update
Item S7-4	Status Update
Item S10	Status Update
Item S15	Status Update
Item S16	Status Update
Item S17	Status Update
Item S18	Responsibility change.

Intermediate Term Actions:

Item C5	Status Update	
Item C7	Status update	
Item C8	Status update	
Item C9	Status update	
Item C11	This is a new action item	Addresses revision of the L.O. job task list and supporting cross-reference matrices.

Long Term Actions:

Item Y7-1	Status update	
Item Y14	Status update	
Item Y16	Status update	
Item Y17	Status update	
Item Y18	Status update	
Item Y20	Status update	
Item Y23	This is a new action item	Addresses formal collection of operator feedback in simulator training.

Short term action items designated with the "S" prefix are to be completed prior to WNP-2 Startup.

- S1. Conduct a Root Cause Investigation including an examination analysis to determine the causes for the failures of the NRC re-examinations and recommend corrective actions.

Responsibility: Schumann, Topley

Comments: A team of training personnel and one independent assessor will conduct the analysis to formulate the basis for future remedial training and lessons learned.

Status: In progress. The report is scheduled to be completed in early August.

- S2. Reconstitute an additional crew and conduct team building training in preparation for an operational evaluation.

Responsibility: McKay

Comments: This training will contain lessons learned from the NRC re-examination. This operational evaluation will be audited by the NRC.

Status: In progress. The crew has been identified (crew B) and has successfully completed three weeks of team training. The crew has been allowed by the NRC to operate on-shift in modes 4 and 5. The crew has yet to complete revised EOP training.

- S3. Review all known EOP discrepancies (human factor related or technical). Correct those which could have an impact on crew performance and safety.

Responsibility: Powers

Comments: The discrepancies will be prioritized to be resolved by either one of two phases.

Status: In progress. Short term (phase one) revisions are scheduled to be completed by the end of July prior to startup. Long term (phase two) revisions are scheduled to be completed by the end of February, 1992. The February date is based on a proposal by CIEL corp. and does not include training time. Phase two items are being tracked separately, refer to action item Y21.

S4-4. Train the operators on changes to the EOP's that were identified in action item S3.

Responsibility: Topley

Comments: EOP training materials will be developed or revised as the new EOP's are developed.
Refer to action item S3.

Status: In progress. Training is scheduled to begin on July 24. All lesson plans have been drafted. The training has been scheduled. Instructors will be trained at the same time as the operating crews. Approximately 18 hours of classroom training has been scheduled for initial training. Additionally, training will be provided to address any subsequent changes to the EOPs.

S5-4. Train the operating crews on the lessons learned from the deficiencies encountered in the Operational Evaluation and NRC re-examination.

Responsibility: Topley

Comments: Major portions of the formal remedial training program will be utilized to address the lessons learned for the remaining operating crews.

Status: In progress. Crews B & D have already been taught on the lessons learned from the Requal exam, Operational Evaluation and the NRC re-take exam. Crews C & E are currently undergoing the training. Crew F has also received one week of new EOP training.

S6. Complete the 1991 licensed operator annual examinations for the remaining operators.

Responsibility: Topley

Comments: An exemption request has been forwarded to Region V. We plan to conduct the exam in phases to allow adequate preparation time and lessons learned training. Preparation will include enhanced transient management training emphasizing EOP usage during complex scenarios.

Status: Open. Remaining annual exams have been scheduled. The first annual exams are scheduled for August 19 and 20. The second group of annual exams is scheduled for the week on August 26. The annual exam will be based upon the revised EOPs. Note: Two licensed individuals are currently not scheduled for participation in an annual exam. This issue will have to be negotiated with the NRC.

S7-4. Conduct additional EOP training (including bases) with the remaining crews.

Responsibility: Topley

Comments: This action will be completed as part of the lessons learned from the Operational Evaluation and NRC re-take examination. The curriculum that will be used will be portions the one utilized for the remedial training of the failed operating crews. Refer to action item S5-4.

Status: In progress. This training is primarily focused towards increasing the CROs knowledge of the EOPs. The training has been completed for four crews. Periodic written exams were given to evaluate the effectiveness of the training and to monitor operator progress. All EOP training including management expectations is now focused on the new EOP flow charts and ESPs. Refer to S4-4.

S8-4. Train the remaining crews on management expectations for EOP usage, including: communications, command and control, entry and exit conditions, STA responsibilities, interpretations and deviation process.

Responsibility: McKay, Topley

Comments: The formal remedial training program addresses all of the items in this recommendation and will be applied to all license holders. Refer to action item S5-4.

Status: In progress. Refer to the status in action items S5-4 and S7-4.

S9. Respond to the requalification program assessment conducted by the outside utility evaluators.

Responsibility: Barmettlor, Topley

Comments: The recommendations contained in the peer report will require review and actions for implementation.

Status: Complete. All recommendations have been responded to. One recommendation has been incorporated into commitment tracking as a corrective action plan, refer to action item Y18.

S10. Conduct additional EOP training (including bases) for the simulator training staff.

Responsibility: Barmettlor

Comments: This will improve the proficiency and capabilities of the instructional staff and is a necessary element to upgrade performance with the EOP's. All SRO certified instructors will be required to attend the classroom portion of the EOP training. Refer to action item S7-4.

Status: In progress. The instructional staff will be provided EOP training the week of July 22. The instructors will initially be trained with the operating crews. The classroom portion of the course is scheduled for 18 hours. Additional training will be provided to address any subsequent changes to the EOPs.

S11-4. Incorporate additional emphasis on "Transient Management" training.

Responsibility: Topley

Comments: Response to this recommendation is one of the primary focuses of the remedial training program. This will provide conditioning for the operators to handle more complex scenario environment.

Status: On-going. Refer to action item S5-4.

S12. Prepare a letter to Region 5 detailing the additional pre-startup activities.

Responsibility: Baker

Comments: This letter should cover the cause for the re-examination failures and all actions required prior to restart.

Status: Complete. Information was provided as part of the July 2nd NRC meeting in Region V. Note: the root cause report will also identify the causes of the crew failures, refer to action item S1.

S13-4. Conduct additional classroom and simulator training for CRO's on the EOP's (including bases).

Responsibility: Topley

Comments: Response to this recommendation is one of the primary focuses of the remedial training program. Revised learning objectives have been approved that identify the minimum knowledge requirements for all licensed operators. The scope of this action item is addressed by action item S7-4.

Status: Refer to action item S7-4.

- S14-3. Review the "Observation Evaluation" program simulator evaluation goals to ensure they are adequate for Plant Management to regularly observe simulator requalification training and evaluation sessions.

Responsibility: Baker

Comments: The current goals do not reflect the desired level of involvement. A revision to the current program is in process.

Status: Complete. Revision has been approved, the revision will significantly increase the amount of management oversight of the Requal program.

- S15. Ensure the operators are exposed to a wide variety of AC and DC electrical malfunctions during simulator training.

Responsibility: Topley

Comments: In response to a weakness identified in the NRC re-take exam analysis. Refer to action item S1.

Status: In progress. Presently there are over 50 dynamic scenarios which can be used to present training and evaluation. Contained within these scenarios are a wide variety of electrical malfunctions. Additional evaluation scenarios are being added to the exam bank that also incorporate various electrical malfunctions.

- S16. Ensure the operators are exposed to a variety of simulator scenarios which will allow them to maintain proficiency in the use of ARPs and Tech. Specs.

Responsibility: Topley

Comments: In response to a weakness identified in the NRC re-take exam analysis. Refer to action item S1.

Status: In progress. Refer to the status in action item S15. The inventory of dynamic scenarios addresses a wide variety of events and event complexities which drives a wide number of plant procedures including Tech Specs and ARPs. Additional evaluation scenarios are being added to the exam bank that also incorporate various tech spec and procedural issues.

- S17. Develop a document that identifies standards of performance for the use of EOPs.

Responsibility: McKay

Comments: To be used by operators and simulator instructors. To ensure consistent use of performance for the EOPs. The content of the IOM will be enforced during simulator training.

Status: In progress. A memorandum has been drafted that address a number of EOP related issues. The draft IOM is being reviewed by Operations Management.

S18 Establish a set of evaluation criteria that will be used by management to determine whether the operating crews are consistently and effectively meeting managements expectations in the conduct of plant and simulator operations.

Responsibility: Mckay

Comments: This criteria is also intended to aid management in the determination of whether the crews are ready for NRC examinations.

Status: In progress. A set of criteria has been drafted and is currently being reviewed for use.

Intermediate term actions Items designated with the "C" prefix are to be completed by the end of September 1991

- C1-3. Develop a more coordinated approach to requalification program scheduling to effectively maintain operating skills and provide adequate examination preparation for the operating crews.

Responsibility: Topley

Comments: In the future all scheduling responsibilities will be assigned to the R/Q supervisor. Also refer to action item C2.

Status: Open, not started.

- C2. Develop the 24 month requalification program schedule including; major systems topics; simulator scenario schedule; static exam practice schedule; JPM practice schedule; update lecture schedule; annual exams; etc.

Responsibility: Topley

Comments: The schedule development has been delayed due to the impact of the R/Q program failure. The R/Q supervisor will be assigned this responsibility.

Status: Open, not started.

- C3-2. Evaluate the identified physical differences between the simulator and the plant to determine if short term changes are necessary, such as; location of fuse pullers, labeling keys, and identify the location of selected simulator back panels

Responsibility: Barmettlor

Comments: Each of the items will be evaluated and appropriate changes made to emulate the in-plant arrangement. If it is not prudent to change the simulator at this point, the differences will be identified to the operators.

Status: Complete. No short term actions were found to be critical other than to provide additional back panel labeling in the simulator.

- C4. Develop and implement a crew training program for Crew "A". Crew performance must be evaluated by the NRC prior to allowing them to operate above Mode-4.

Responsibility: Topley

Comments: The crew training program will be derived from portions of the remedial training curriculum. Implementation is currently scheduled to begin during the first week in September.

Status: Open. The training of crew "A" is not scheduled to begin until September. The training curriculum has already been fully developed.

- C5. Conduct a team inspection of the nuclear license training programs to assess corrective action effectiveness and overall program adequacy.

Responsibility: Bouchey

Comments: This effort will be completed by Licensing and Assurance personnel in July 1991 and July 1992. They intend to utilize internal as well as external reviewers to accomplish a broad scope multi-disciplined assessment. This will be in addition to the other review activities previously described.

Status: In progress. To date three formal written reports has been published. Each report contains a number of short term and long term recommendations. The recommendations are being evaluated and prioritized by the Nuclear License Training organization.

- C6. Deleted. Refer to action item Y22.

- C7. Revise LTI 4.1 Simulator Scenario Development

Responsibility: Topley

Comments: Revision of LTI 4.1 is necessary to ensure all dynamic scenarios are developed and maintained in a consistent format which meets all INPO and NRC requirements, specifically the latest version of NUREG 1021.

Status: In progress. The current version of the LTI has been reviewed and the determination has been made to divide it into two separate procedures. One LTI would address dynamic scenario construction. The other LTI would describe how to conduct training and evaluation scenarios, including the critique process and documentation requirements.

- C8. Conduct a formal evaluation of the performance of each simulator instructor.

Responsibility: Anfinson

Comments: As a minimum, one detailed instructor evaluation will be conducted for each individual (permanent staff and contractor) who has been involved in the Requal remedial training program. The results of the instructor evaluation will be used to improve individual performance. The data will also be used to revise the simulator instructor qualification training program.

Status: In progress. A revised evaluation checklist has been developed that is being used to assess the simulator instructor performance.

- C9. Develop a formal set of criteria which identify acceptable STA job performances in support of the operating crew s during abnormal and emergency conditions. Additionally, develop and implement a set of supporting evaluation criteria which will be used to formally evaluate STA performance in the simulator
- Responsibility: Talbert, Barmettlor

Comments: The need for the criteria is to ensure consistency of performance of the STA during off-normal and emergency plant conditions. The criteria will be used by management and the training staff in order to more effectively evaluate STA performance in the simulator.

Status: In progress. Bob Talbert has identified a list of possible criteria. The draft criteria has been reviewed by Operations and Training. A final product should be issued within a week.

- C10. Make arrangements for individual license holders who are not part of an identified crew to complete their annual exam as a staff crew. Provide the necessary simulator team training to the staff crew prior to the conduct of an annual exam.

Responsibility: Topley.

Comments: Currently this only affects two licensed operators. Arrangements have to be made with the NRC in order to delay the exams of the affected operators.

Status: Refer to action item S6 status.

- C11. Review and revise as necessary the licensed operator job task lists to incorporate the changes in the revised EOPs. Revise the training to task cross-reference matrices in order to identify the training materials which support the EOP tasks.

Responsibility: Barmettlor, Westergren

Comments: This action item will be addressed by the normal TUS process. A priority will be assigned to ensure the task will be completed by the end of September.

Status: Not started.

Long term action items designated with the "Y" prefix are to be completed by the end of February 1992

Y1-1. Revise the JPM's to eliminate unnecessary critical steps and include negative response steps.

Responsibility: Topley

Comments: All JPMs will be reviewed over the next several months and revised as necessary.

Status: Open, not started.

Y2-1. Revise the written examination bank to reduce the number of negative response questions.

Responsibility: Topley

Comments: Will be completed as part of the on-going exam bank review and revision process.

Status: Open, not started.

Y3-2. Increase the use of video taping in order to evaluate operating crew performance during simulator sessions.

Responsibility: Barnettlor

Comments: Actions have been taken to install several video cameras and microphones in order to effectively tape simulator scenarios. The tapes will be used to review crew and individual performance. Additionally selected tape sequences will be used to develop training materials for new operators and simulator instructors.

Status: This action has become an on-going function of the simulator portion of the Licensed Operator Requal program.

Y4-2. Conduct static simulator examination practice as part of the on-going requalification program.

Responsibility: Topley

Comments: Time for additional practice will be incorporated into future R/Q training cycles.

Status: Open. Not started.

- Y5-3. Attempt to achieve more timely agreement on the content of future NRC examinations (at least 30 days prior to the examination).

Responsibility: Barmettlor

Comments: Prior to all future R/Q NRC examinations the utility staff will attempt to arrange NRC review of the proposed examination materials at least 30 days prior to the examination. The staff will travel to the NRC and formally present the exam package. Further, the utility training staff will maintain regular contact with the appropriate NRC points of contact (Region 5 and NRR) to keep cognizant of any changes the Regual that could affect the examination process.

Status: Open.

- Y6-1. Incorporate appropriate lessons learned into the Licensed Operator initial training curriculum.

Responsibility: Powell

Comments: Prior to the commencement of the next Licensed Operator initial training class, all relevant lessons learned will be incorporated into the training curriculum.

Status: In progress. Selected initial training instructors have participated in various aspects of the requal program. they have already identified a number of lessons learned for incorporation into the licensed operator initial training curriculum.

- Y7-1. Conduct a reverification and revalidation of the static portion of the exam to assure the scope of the exam is proper relative to the number of participants and availability of reference materials.

Responsibility: Topley

Comments: When all future static examinations are validated, the validation process will use full operating crews with the same numbers of reference materials that will be utilized in the conduct of an actual NRC examination.

Status: In progress. The static portion of the annual exams being developed for use in August are being validated to ensure sufficient time and resources are available to complete the exam in a timely manner,

- Y8-4. Conduct a Human Factors evaluation of WNP-2 EOP's.

Responsibility: McKay, Messersmith

Comments: The human factors evaluation is scheduled to begin in June, and will be completed in July. This will be accomplished by a team of independent experts on contract. Licensing and Assurance personnel will participate as deemed necessary.

Status: Complete.

- Y9-1. Upgrade the static examination process by linking the associated exam bank to specific learning objectives.

Responsibility: Topley

Comments: As part of the on-going revision and development process actions will be taken to ensure a strong correlation between static test items, the appropriate learning objectives and the exam bank.

Status: Open. Not started.

- Y10-2. Review the update lecture material selection process to eliminate duplicate training received through the required reading process.

Responsibility: Topley, Ops Liaison

Comments: To the extent practical, more credit will be taken for the required reading program in order to eliminate duplicate training. Where possible, the material could be covered in a plant systems review or simulator scenario.

Status: Open. Not started.

- Y11-3. Obtain a copy of the NRC National Examination Schedule and assign responsibility to contact the utility after the examination for lessons learned.

Responsibility: Barnettlor

Comments: The Nuclear License Training Manager will be tasked with maintaining a timely awareness of industry wide lessons learned associated with the R/Q examination process through various means, including monitoring the national exam schedule.

Status: This action item has been established as a long term on-going activity. Actions have already been taken to send instructors to BWRs that are undergoing NRC administered R/Q exams to observe the exam process.

- Y12-3. Evaluate continuing operator requalification training through refueling outages.

Responsibility: Baker

Comments: Based on the remedial training program taking place this refueling outage, it appears that this is a possibility and may be prudent when the need is justified. The NRC strongly recommends this action be taken. Very few utilities do not have year around Requal.

Status: Open. This action item will be formally addressed as part of the revision to the requal program description. Refer to action items C1 and C2.

Y13-4. Staff all crews with 3 Licensed Reactor Operators.

Responsibility: McKay

Comments: The long term intent of the Operations Department is to staff each crew with 3 CRO's.

Status: Complete. The decision has been made to staff all active crews with three CROs.

Y14. Evaluate possible improvements in the solicitation and utilization of student feedback in the requalification training program.

Responsibility: Topley, Operations Liaison

Comments: Improving critiques will indirectly improve student feedback, however, it appears that we could benefit by directly appealing for structured feedback.

Status: In progress. A number of techniques are being utilized during the remedial training process to collect and act upon student feedback. The most effective techniques will be formally utilized in on-going requal. Refer to action item Y23.

Y15. Resolve remaining EOP issues by continuing to work through the BWROG to resolve EOP concerns such as the ATWS instability phenomenon.

Responsibility: McKay

Comments: This action rests with plant management and may be a protracted process. The impact on the training program in the interim is minimal. Progress on this action is a function of the BWROG and the Supply System has little direct control.

Status: Open. Not started.

Y16. Evaluate the current measurement tools (ES604 crew competency form) for non-technical skills and implement improvements to enhance the training evaluator and management staff effectiveness in this area.

Responsibility: Mixon

Comments: The Supply System organizational consultant is currently pursuing this objective.

Status: In progress. Draft assessment tools have been developed and implemented. Additional revisions are being made based on experience. Currently, the tool is not in a format that can be readily used by untrained evaluators.

- Y17. Implement a program to send our evaluation staff to other utilities on a rotational basis.

Responsibility: Kobus

Comments: This program would allow our evaluators to witness similar activities at other facilities. This mutual interface has benefit for both parties to see other examples and standards for scenarios and techniques. Also refer to action item Y11-3.

Status: In progress. To date, two instructors have observed annual exams at Brunswick and Fermi.

- Y18. Develop, and consistently apply, a comprehensive simulator evaluation grading and critique system to include adequate reconstruction of events and critical discussion of less than adequate performance.

Responsibility: Barmettlor, Topley

Comments: The action item is in response to a peer utility team recommendation (Refer to action item S9). Several actions are being taken to respond to this issue including increased use of videotaping (Refer to action item Y3-2). Outside contract resources are being used to provide instruction and feedback to the WNP-2 simulator training staff.

Status: In progress. Additional oversight is being taken regarding the observation and evaluation of simulator instructor performance during training and evaluation scenarios. Where needed guidance is provided to the instructor to ensure desired behavior is accomplished. Refer to action items C7 and C8.

- Y19. Revise the Requal dynamic simulator scenario exam bank to ensure all scenarios are technically correct, consistently formatted, reflect the revised EOPs and to ensure all requirements of LTI 4.1 are met.

Responsibility: Topley

Comments: Action is necessary prior to submittal of the exam bank to the NRC in December, 1991.

Status: Open. Not started. Necessary technical changes are documented as they are being identified during the remedial training.

- Y20. Respond to the requalification program assessment by outside peer evaluators that observed simulator training after the June 5 and 6 NRC re-take exam.

Responsibility: Barmettlor, Topley

Comments: Three peer utility visits are scheduled in July and August. Each peer team will consist of members from both training and operations. Each team will consist of members from two or three utilities. Each group will have three team members

Status: Open. Not formally started. As draft reports are issued those recommendations which can be quickly addressed are implemented into the training program. To date, two draft reports have been issued. The third team of peer evaluators will be at WNP-2 the week of August 12.

Y21. Complete long term (phase two) EOP changes.

Responsibility: Powers

Comments: Refer to action item S3.

Status: In progress. Long term (phase two) revisions are scheduled to be completed by the end of February, 1992. The February date is based on a proposal by CIEL corp. and does not include training time.

Y22. Establish an Operations/Training Advisory Committee to monitor effectiveness of operator training.

Responsibility: McKay, Topley

Comments: This committee will be formed and its charter approved early in the fourth quarter of 1991. Its purpose will be to monitor effectiveness of training in all areas of operator training (requal, initial license, equipment operator). The committee concept will be formally endorsed in the revision of the requal training program description. This action item used to be designated as C6.

Status: Open, not started.

Y23. Develop and implement a formal process to document feedback from the operations and training staff during simulator training, resolve the comments and provide feedback to the originator.

Responsibility: Barmettlor

Comments: Response to this action item will evolve from the activities associated with action item Y14. A LTI will be generated that will formally capture the process to be utilized.

Status: Not started

Short term action items designated with the "R" prefix are to be completed prior to the June 5, 1991 NRC Requal Re-examination

R1-1. Develop and implement a remedial training program for the identified operators.

Responsibility: Barmettlor, McKay

Comments: A 3 phase program has been developed focusing on; plant systems review, EOP training and transient management. Written examinations and skill performance evaluations will be used throughout to assess training effectiveness.

Status: Complete.

R2-1. Revise the current simulator scenario bank and develop new scenarios as necessary to meet the current management expectations.

Responsibility: Barmettlor

Comments: New simulator scenarios are being developed as part of the remedial training program. This will ensure operators are trained and able to evaluate, prioritize and handle complex emergency situations. Many of the new scenarios are now of the same complexity as those utilized by the NRC (i.e. requirements of ES-604).

Status: Complete.

R3-1. Revise simulator ISCTs to meet the current management requirements.

Responsibility: Barmettlor

Comments: This effort will cover generic as well as specific tasks and be incorporated in a department instruction (4.2). These ISCTs are based upon the guidance provided in the examiners standards.

Status: Complete.

R4-2. Develop and implement dynamic simulator training that will heighten the level of intensity for crew training management examination philosophy.

Responsibility: Barmettlor

Comments: Various approaches to responding to this recommendation will be evaluated during the next few training cycles. The most effective and practical will then be institutionalized.

Status: This action has become an on-going function of the simulator portion of the Licensed Operator Requal program.

- R5-2. Periodically revise the scenario structure to ensure variety so the scenarios do not become predictable to the operators.

Responsibility: Barmettlor

Comments: This practice will be made an on-going process during the selection and/or development of scenarios.

Status: This action has become an on-going function of the simulator portion of the Licensed Operator Requal program.

- R6-4. Review examination results with the licensed operators requiring remedial training.

Responsibility: Barmettlor

Comments: This recommendation has been completed as part of the formal remedial training program.

Status: Complete.

- R7-4. Re-examine all affected operator candidates prior to NRC re-evaluation.

Responsibility: Barmettlor

Comments: This recommendation will be completed as a part of the formal remedial training program.

Status: Complete.

- R8-2. Conduct refresher training for the simulator training staff focusing on the identified needs from the examination process. Examples are; operator monitoring and data collection, questioning techniques, conduct of scenario critiques, and use of root cause techniques

Responsibility: Barmettlor

Comments: This training included the evaluation program improvements recently implemented. The possible use of root cause techniques has been evaluated and found to be impractical due to timeliness requirements. In the future, more effective data collection and use will be realized through the new simulator audio and video capabilities.

Status: Complete.

- R9-2. Upgrade the simulator training techniques to emphasize operator performance as expected in the plant, spend more of the time coaching and provide for role reversals at the SRO level by; placing more emphasis on training versus evaluating, rewarding the control room staff for directing appropriate actions (i.e. through restoration of equipment) outside the control room, requiring completion of physical actions by the operators, and providing feedback to individual operators via critique sheets in both pass and fail situations.

Responsibility: Barmettlor

Comments: As schedules permit, more training time will be incorporated into the on-going R/Q training cycles. Increased attention will be placed on the post scenario critique process in order to enhance scenario quality.

Status: This action has become an on-going function of the simulator portion of the Licensed Operator Requal program.

- R10-2. Brief the operators on changes implemented by Revision 6 of the Examiner Standards.

Responsibility: Barmettlor

Comments: Response to this recommendation is considered complete. The annual examination and remedial training program have been conducted in accordance with this revision.

Status: Complete.

- R11-4. Issue a memorandum from plant and senior management to describe management expectations relative to procedure usage to all license holders, licensed operator trainers, shift technical advisors, applicable TSC emergency staff and licensing and assurance personnel who monitor operations and operations training activities.

Responsibility: Baker, McKay

Comments: Solicit commitment to abide by this direction by signature from the operators.

Status: The memo has been issued.

- R12-4. Conduct a meeting with all license holders, trainers and STAs at which plant and senior management will describe the challenges of the current situation, the actions being taken to correct deficiencies and improve performance, and will entertain suggestions for additional actions.

Responsibility: Oxsen, Baker

Comments: This will be videotaped. Tentatively scheduled for 5/16.

Status: Complete.

- R13.. The remedial training program module on management expectations will require review to ensure there is appropriate focus on EOP performance.

Responsibility: McKay

Comments: The operators in remedial training will receive this module in the remedial training process and the remaining operators will receive this module as soon as possible thereafter.

Status: Complete.

- R14-4. Review and revise PPM 1.3.1, "Conduct of Operations", to clarify direction to the operations personnel regarding the use of the 10 CFR 50.54(x) exemption.

Responsibility: McKay

Comments: Training on this clarification will be completed as necessary.

Status: Complete.

- R15-3. Develop an improved monitoring plan for increased QA oversight of EOP training.

Responsibility: Bouchey

Comments: This activity should also assist in getting the operators accustomed to scrutiny.

Status: Complete.

- R16. The analysis for the requalification, operational evaluation and the SRO involved in the replacement operator examinations will be assimilated and sent to Region V NRC management.

Responsibility: Barmettlor

Comments: This will be described in the letter to the NRC as a follow-up to the 5/2/91 meeting.

Status: The analysis has been completed and sent to Phil Johnson. This may be revised as further scrutiny of the examinations dictates.

- R17-3. Improve the training management structure.

Responsibility: Barmettlor

Comments: Two Supervisors will be in place in the Nuclear License Training Department by the end of May 1991. Candidates for both positions have been selected. The nuclear license training department is being reorganized to support the assimilation of the new supervisors. A new operations liaison has been assigned to training. This position assumes the role of lead evaluator during simulator training. This individual is expected to provide more aggressive evaluation and feedback.

Status: Complete.

R18-3. Write a department instruction that delineates the duties and responsibilities of the Operations Liaison.

Responsibility: Barmettlor

Comments: The instruction has been completed and issued as LTI 7.4.

Status: Complete.

R19-3. Write a memorandum to the training staff to encourage continued feedback on procedure enhancements.

Responsibility: Barmettlor, Kobus

Comments: The memo stated the policy, expectations and process to be utilized.

Status: Complete. The memo has been promulgated.

R20. Evaluate the support required for the remedial training process and obtain the necessary resources.

Assess the logistics for the possibility of increased training if our evaluation process indicates the need (ie. overtime, outage schedule impact, etc.).

Responsibility: Barmettlor, McKay

Comments: The NRC examinations will not be started until we believe the operators are ready.

Status: Complete.

R21-3. Conduct an assessment of the remedial training process with a team of experts drawn from other utilities.

Responsibility: Oxsen, Barmettlor, Little

Comments: Written objectives have been completed. John Little is the coordinator for this activity.

The assessment will occur the week of 5/20/91. Team members have been identified (one person) from each of the following plants; Hatch, Quad Cities, Nine Mile Point, Fermi, and Clinton. They will observe at least 2 scenarios on all 3 crews.

Status: Complete.

R22-3. Increase management oversight to include the simulator remedial training process.

Responsibility: Baker

Comments: The current oversight schedule has been revised to include simulator time.

Status: Complete.

R23-4. Clarify the hierarchy of adherence to cool down rates relative to RPV level control.

Responsibility: McKay

Comments: Response to this recommendation has been incorporated into the remedial training program. All remaining crews will receive this training as part of the lessons learned from the Operational Evaluation.

Status: Complete and implemented through other CAP action items.

R24-4. Clarify the use of HPCS versus the Operational philosophy that use should be minimized because of thermal shock, cool down and cold water reactivity addition concerns.

Responsibility: Barmettlor

Comments: Response to this recommendation has been incorporated into the remedial training as part of the lessons learned from the Operational Evaluation.

Status: Complete and implemented through other CAP action items.

R25-4. Conduct training on the expected EOP deviation process and the expectations for implementation when deviations are required.

Responsibility: Barmettlor

Comments: This guidance should be clarified in the unlikely event that deviations are necessary. The revision to PPM 1.3.1 should be approved on 5/15, at which time training can be accomplished.

Status: Complete.

R26-3. Assign utility personnel to the simulator evaluation staff to prevent a lack of continuity due to the unforeseen departure of the current contract employees.

Responsibility: Barmettlor

Comments: Action has already been taken to fully address this recommendation. In the future, the utility staff will always play a key role in the simulator training and evaluation process.

Status: Complete.

R27-2. Ensure that simulator instructors always enforce proper communications, event diagnosis, command and control and procedural compliance in training and evaluation scenarios.

Responsibility: Barmettlor

Comments: This activity will be stressed as part of the management oversight and QA monitoring effort. It will also be part of the duties and responsibilities assigned to the Operations Liaison. Our organizational consultant will be assisting to improve the effectiveness of this effort.

Status: This action has become an on-going function of the simulator portion of the Licensed Operator Requal program.

R28. Evaluate the effectiveness of the management expectations presentations.

Responsibility: Bouchey

Comments: This effort will be completed by Licensing and Assurance personnel.

Status: Complete.

R29. Evaluate the transient management training portion of the remedial training program.

Responsibility: Bouchey

Comments: This effort will be completed by Licensing and Assurance personnel.

Status: Complete.

R30. Continue increased QA oversight of control room activities emphasizing adherence to procedures.

Responsibility: Bouchey

Comments: This is one of the primary methods to assess effectiveness of recent training. This item will remain open until all personnel have completed the annual examinations.

Status: On-going through startup of WNP-2.

R31. A management action plan will need to be generated which identifies all actions and due dates.

Responsibility: Kobus, Barmettlor

Comments: This plan should capture all actions from the root cause, as well as any additional actions in the appropriate level of detail.

Status: Complete. The plan will be a living document.

R32. Prepare a letter to the NRC which describes the additional actions taken in response to the 5/2/91 meeting and contains the management action plan.

Responsibility: Kobus

Comments: This package should also contain attachments to support the actions taken prior to the NRC re-examination. Should be mailed by May 16.

Status: Complete.

R33. Prepare a presentation for Region V NRC management personnel to present additional actions as a follow-up to the 5/2/91 meeting.

Responsibility: Kobus

Comments: This presentation will occur on 5/20.

Status: Complete.

R34. Establish a process to trend evaluation results of each license holder.

Responsibility: Barmettlor

Comments: This activity will allow for detection of individual performance trends requiring correction such as competency factors. A data base has been developed and implemented which is used to track crew and individual simulator performance as related to ISCTs and competencies.

Status: This action has become an on-going function of the simulator portion of the Licensed Operator Requal program.