

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9109180154 DOC. DATE: 91/09/09 NOTARIZED: NO DOCKET #
FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
AUTH. NAME AUTHOR AFFILIATION
OXSEN, A.L. Washington Public Power Supply System
RECIP. NAME RECIPIENT AFFILIATION
MARTIN, J.B. Region 5 (Post 820201)

SUBJECT: Responds to restart actions of 910614 confirmatory action
ltr re unsatisfactory licensed operator requalification
training program & establishes how facility has met restart
requirements delineated in confirmatory action ltr.

DISTRIBUTION CODE: IE42D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 9
TITLE: Operator Licensing Examination Reports

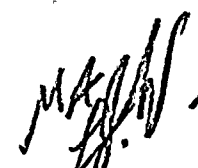
NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD5 PD	1 1	ENG, P.L.	1 1
INTERNAL:	ACRS	2 2	NRR SHANKMAN, S	1 1
	NRR/DLPQ/LHFB11	1 1	NRR/DLPQ/LOLB10	1 1
	REG FILE 02	1 1	RGN5 FILE 01	1 1
EXTERNAL:	NRC PDR	1 1	NSIC	1 1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 11 ENCL 11



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

September 9, 1991
G02-91-164

Docket No. 50-397

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

Dear Mr. Martin

Subject: **NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21
UNSATISFACTORY LICENSED OPERATOR REQUALIFICATION
TRAINING PROGRAM**

- References:
- 1) Letter, JB Martin (NRC) to AL Oxsen (SS), same subject, dated June 14, 1991
 - 2) Letter, G02-91-156, GC Sorensen (SS) to JB Martin (NRC), "Unsatisfactory Licensed Operator Requalification Training Program - Root Cause Analysis", dated August 20, 1991
 - 3) Letter, G02-91-153, AL Oxsen (SS) to JB Martin (NRC), "Licensed Operator Requalification Program Corrective Action Plan", dated August 16, 1991

This letter responds to the restart actions of the Reference 1 Confirmatory Action Letter and establishes how WNP-2 has met the restart requirements delineated in the Confirmatory Action Letter.

Included in Action 6 of the Confirmatory Action Letter were requirements for the Supply System to 1) conduct a root cause evaluation of the June 5 and 6 crew and operator failures, 2) specify a Corrective Action Plan and schedule for these failures, and 3) present a program for assessing the effectiveness of the Corrective Action Plan. The status of these items is discussed below.

**UNSATISFACTORY LICENSED OPERATOR REQUALIFICATION
TRAINING PROGRAM**

1. In Reference 2 the Supply System submitted the required root cause analysis. Included within this root cause analysis is an evaluation as to why the May 16, 1991 Corrective Action Plan was not effective in identifying and preventing the problems that occurred in the retake examination. The majority of the recommendations included in the Reference 2 root cause analysis have been incorporated into the Corrective Action Plan transmitted with Reference 3. This is shown in Attachment 1 to this letter. Attachment 2 discusses that status and schedule for those root cause recommendations not included in the Corrective Action Plan.
2. In Reference 3 the Supply System submitted the required Corrective Action Plan to the NRC. In the Corrective Action Plan, remaining corrective actions were scheduled for short, intermediate, and long term resolution. All short term actions have been completed with the exception of those specifically associated with the completion of the 1991 licensed operator annual examinations. These we expect to complete on September 10, 1991. All intermediate term actions will be completed by the end of the first requalification cycle, and all long term actions will be completed by February 29, 1992. There have been no changes in the assignment of the schedules for the action items from that presented in Reference 3.
3. The Supply System plans for the assessment of the effectiveness of the identified corrective actions are as follows:

Oversight will be performed by the Licensing and Assurance Directorate. An individual has been assigned to lead this task who was previously licensed on WNP-2 and has previous experience in operator training.

The Supply System's Board of Directors intends to have in place by September 30, 1991 a contract for outside review of the Supply System's Technical Training Program. The effort will include an assessment of the effectiveness of all technical training programs relative to NRC and INPO requirements. Included within the contract work scope is a review of the licensed operator training. It also includes an evaluation of all Supply System activities performed in response to the recent failures.

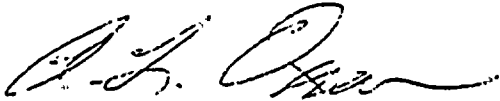
The peer review program by which the Supply System utilizes individuals from other utilities to evaluate the performance of operators, trainers and evaluators will continue.

**UNSATISFACTORY LICENSED OPERATOR REQUALIFICATION
TRAINING PROGRAM**

Action 6 also required that the Supply System present the root cause analysis and corrective action plan prior to WNP-2 restart. Based on the information provided by the Supply System in References 2 and 3 and discussions between Region V Management and Supply System Management, the Supply System believes that no additional presentation of this material is necessary prior to restart.

In response to Action 7 of the Confirmatory Action Letter the Supply System has completed all corrective actions on the significant deficiencies identified in the requalification examination, Operational Evaluation and the requalification simulator examination retakes as identified in the Corrective Action Plan. As stated above, one exception is the completion of the annual examinations scheduled to be completed on September 10, 1991.

Very truly yours,



A. L. Oxsen
Deputy Managing Director

SLW/AGH/bk
Attachments

cc: Document Control Desk
NS Reynolds - Winston & Strawn
PL Eng - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A

ATTACHMENT 1

Attachment 1 is a cross reference between the root cause recommendations of Reference 2 and the corrective action plan corrective actions of Reference 3. The number references are the root cause recommendation number.

4. Recommendations:

Some of these recommendations are paralleled by the "Licensed Operator Requalification Program Corrective Action Plan" Rev 7 dated 6 Aug 1991. However, due to the expansive nature of this report additional and supplementary recommendations have been delineated to address those enhancements above the commitments of the "Corrective Action Plan."

4.1 Conduct simulator training for the operators on all legs of the EOPs.

- In corrective action plan, items S-3, S7-4, S11-4, S5-4...completed
- Restart item by CAP

4.2 Establish in the EOP revision process an EOP program coordinator, other than the implementer, to review the change for editorial/technical designation and to conduct the Validation and Verification. This method will introduce a measure of independence into the process, currently centralized with the individual responsible for implementation. Further recommendations to the program are provided in Licensing & Assurance oversight reports; OR91-002, SS91-001, SS91-002.

- Not in Corrective action plan
- Long term issue, Not a restart item

4.3 Revise the process to coordinate the EOP revisions with the Plant Specific Technical Guidelines (PSTGs).

- Not in Corrective action plan
- Completed, Restart item

4.4 Establish a formal feedback process in the EOP revision program which includes a formal mechanism to inform the originator about the resolution of the proposed change.

- In Corrective action plan, Item Y-23
- In progress, Not a restart item

4.5 Revise the EOPs to comply with the rules of the Writer's Guide.

- In Corrective Action plan Y-21
- Completed, Restart issue

- 4.6 Incorporate Operations Liaison into active participation and responsibility within the scope of the training curriculum. This function can be provided by a proactive more effective utilization of the Operations Liaison position to ensure that operators, through their communications channels, provide input to the Requalification Training Program.

-Not in Corrective action plan,
-In progress, Long term issue, Not a restart issue

- 4.7 Provide for appropriately scoped L & A oversight efforts in the area of licensed operator requalification. This effort should include evaluation of operator readiness prior to plant restart as well as continued broad based evaluation of training program effectiveness and EOP adequacy.

-In Corrective action plan, R15-13
-Completed, Not a restart issue

- 4.8 Evaluate plant design changes to eliminate obstacles to operator's performance by adding readable containment/drywell parameters, a means of preventing injection from low pressure ECCS systems during Emergency Depressurization, and a capability to silence alarms. Another recommendation is the placement of ARPs convenient to the control panels which is presently being implemented. Further development on these plant modifications is found in QASR 2-91-048.

-Not in Corrective Action plan
-Long term issue, Not a restart issue

- 4.9 Allow crews in training to be exempt from watch standing to promote maximum effort in the training cycle prior to requalification exam.

-Not in Corrective action plan
-Completed, Not a restart issue

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

-In Corrective Action plan, Item S-3
-Phase I completed (All known technical and majority of human factors resolved),
Phase II (Balance of human factors completed Feb 92, Not a restart issue

- 4.11 Continue to train the operators on the changes to the EOPs as they are evaluated.
- In Corrective action plan, Item S4-4
 - Completed, Restart issue
- 4.12 Conduct additional EOP training (including bases) with the remaining crews which have not had the benefit of the intensive training that crews X, Y, and Z have had.
- In Corrective action plan, Item S7-4
 - Completed, Restart issue
- 4.13 Conduct additional EOP training (including bases) for the simulator training staff. This should include dynamic training for the staff in the simulator. This training should also provide all staff with the Simulator Instructor Training Course.
- In Corrective action plan, Item S-10
 - Completed, Restart issue
- 4.14 Incorporate additional emphasis on Transient Management training (to provide conditioning for the operators to handle a more complex scenario environment).
- In Corrective action plan, Item S11-4
 - Completed, Restart issue
- 4.15 Enhance the tools and criteria used by management when conducting oversight in accordance with the Observation Evaluation Program to ensure it satisfies Plant Management's needs.
- In Corrective action plan. Items Y-16, S14-3
 - S14-3 Completed, Y-16 Long term issue, Not a Restart Item
- 4.16 Ensure the operators are exposed to a wide variety of AC and DC electrical malfunctions during simulator training.
- In Corrective action plan, Item S-15
 - Completed, Restart issue

- 4.17 Ensure the operators are exposed to a wide variety of simulator scenarios that will allow them to maintain proficiency in the use of ARPs and Technical Specifications.
- In Corrective action plan, Item S-16
 - Completed, Restart issue
- 4.18 Review the necessary criteria that will be used by management to determine whether the operating crews are consistently and effectively meeting management expectations in the conduct of plant and simulator operations.
- In Corrective action plan, Item S-18
 - In progress, Restart issue
- 4.19 Review the need to have Requalification Crews complete audit exams prior to being examined by the NRC. This should be directed to management with due consideration of the degree of training provided with explanation of the basis.
- Not in Corrective action plan
 - Long term issue, Not a restart issue
- 4.20 Establish an Operations/Training Committee to monitor effectiveness of operator training.
- In Corrective action plan, Item Y-22
 - Open item, Not a restart issue
- 4.21 Conduct a formal evaluation of the performance of each simulator instructor.
- In Corrective action plan, Item C-8
 - In progress, Not a restart issue
- 4.22 Establish specific feedback criteria on communication performance to instill consistent performance.
- In Corrective action plan, Y-16
 - In progress, Not a restart issue
- 4.23 Increase the involvement of other utilities in training, operations and maintenance on a cooperative basis to benchmark our standards and to prevent unjustifiable misalignment with industry practices.
- Not in the Corrective action plan
 - Long term management issue, Not a restart item

ATTACHMENT 2

This attachment addresses those recommendations from the Reference 2 root cause analysis for which there is no corresponding corrective action in the Reference 3 Corrective Action Plan. Attachment 1 is a cross reference between the root cause recommendations and the corrective action plan corrective actions. The number references are the root cause recommendation number.

- 4.2 Establish within the EOP revision process a EOP program coordinator.

Prior to implementation of the Phase II EOP changes the EOP revision process will be re-evaluated. This action will be completed by December 1, 1991.

- 4.3 Revise the process to coordinate the EOP revisions with the Plant Specific Technical Guidelines (PSTGs).

This action was completed for the current EOP revisions. As stated in item 4.2 above, the EOP revision process will be re-evaluated by December 1, 1991.

- 4.6 Incorporate the Operations Liaison into active participation and responsibility within the scope of the training curriculum.

The Operations Liaison position is described in Licensing Training Guide LTI-7.4, "Operation Liaison Responsibilities". This position description will be reviewed for adequacy by October 15, 1991.

- 4.8 Evaluate Plant design changes to eliminate obstacles to operator's performance.

The Operations Liaison will ensure that concerns are addressed by initiating a Problem Evaluation Request or a Technical Evaluation Request. These documents are reviewed by Plant Management. This action will be completed by October 15, 1991.

- 4.9 Allow crews in training to be exempt from standing watch.

During the current requalification cycle operations personnel were not allowed to stand watch and train on the same shift.

- 4.19 Review the need to have Requalification crews complete audit exams prior to being examined by the NRC.

This is an option that will be considered on an as-needed basis as determined by the Technical Training and Operations Managers.

- 4.23 Increase involvement of other utilities in training, operations and maintenance on a cooperative basis.

For the purposes of this letter this response is limited to the training area. The Supply System has recently sent two training instructors to other utilities to observe licensing examinations. It further intends to send Managers to visit other utilities, continue the peer evaluation program, and participate in industry organizations addressing training issues.