

POWER AUTHORITY OF THE STATE OF NEW YORK

JAMES A. FITZPATRICK NUCLEAR POWER PLANT



CORBIN A. McNEILL, JR.  
Resident Manager

P.O. BOX 41  
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315-342-3840

May 6, 1982  
SERIAL: JAFP 82-0498

United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA. 19406

Attention: Thomas T. Martin, Director  
Division of Engineering & Technical Programs

SUBJECT: NRC INSPECTION 50-333/82-05

Dear Mr. Martin:

With reference to the inspection conducted by Mr. E. Thomas Shaub of your office on March 1-4, 1982, at the James A. FitzPatrick Nuclear Power Plant, and in accordance with the provisions of 10 CFR 2.201, we are submitting our response to Appendix A Notice of Violation transmitted by your letter dated April 6, 1982, as received by the undersigned on April 8, 1982.

APPENDIX A

NOTICE OF VIOLATION

As a result of an inspection conducted at the James A. FitzPatrick Nuclear Power Station on March 1-4, 1982, and in accordance with Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified:

- A. Technical Specification 6.4, states, in part, "A training program shall be maintained under the direction of the Training Coordinator ... It shall consist of retraining ... and shall meet or exceed the minimum requirements of Section 5.5 of ANSI N18.1-1971."

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ANSI N18.1-1971 Section 5.5 states, in part, "A training program shall be established which maintains the proficiency of the operating organization ..."

James A. FitzPatrick, Indoctrination and Training Procedure ITP-3, "General Employee Training" Revision 2, November 19, 1980, which implements ANSI N18.1-1971, requires in:

- (1) Section 3.5.9, annual requalification in Radiation Protection; Security Plan and Procedures; and Emergency Plan and procedures;
- (2) Section 3.5.8, initial training in Quality Assurance (QA) and Quality Control (QC) for permanent employees within 6 weeks of hire; and
- (3) Section 3.5.7, that Industrial Safety Indoctrination be the normal responsibility of the department superintendent ...at the time of hire; and Section 3.4.1, that the Training Coordinator be responsible for the performance and documentation of training in accordance with this procedure.

Contrary to the above, as of March 4, 1982:

- (1) The annual requalification in Radiation Protection, Security Plan and procedures; and Emergency plan and procedures was not provided for thirteen employees during the last 15 months;
- (2) The initial QA and QC training for eight employees had not been performed within six weeks of hire; and
- (3) Industrial Safety Indoctrination was not being provided for all new employees at the time of hire, and there were no controls in place so that the Training Coordinator could ensure performance and documentation of the Industrial Safety training required by ITP-3.

This is a Severity Level V Violation (Supplement I)

RESPONSE TO  
NOTICE OF VIOLATION

The required Radiation Protection, Security Plan, Emergency Plan, QA, QC and Industrial Safety requalification or initial training has been partially completed. Completion of the training requires a comprehensive review of approximately 420 training files to identify those individuals that may be deficient in one or more areas. This review has been initiated and is expected to be complete within 2 weeks allowing all of the training to be completed by July 9, 1982. This action will bring the plant into full compliance.

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To prevent recurrence, a card index system has been fully implemented to provide identification of those individuals requiring retraining and Indoctrination and Training Procedure (ITP) No. 3, "General Employee Training" is currently being revised to include some INPO Guidelines for General Employee Training. Implementation of the card index system, which will be replaced with an expanded computed system by October 1, 1982, and the revision of ITP-3, should prevent recurrence.

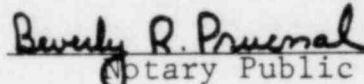
Very truly yours,

  
CORBIN A. McNEILL, JR.  
RESIDENT MANAGER

CAM:DS:brp

CC: Leroy W. Sinclair, PASNY, NYO  
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NRC Resident Inspector  
NRCI 82-05 File  
Document Control Center

Subscribed and Sworn to before  
me this 6th day of May, 1982

  
Notary Public

BEVERLY R. PRUCNAL, #4628499  
Notary Public - State of New York  
Appointed in Oswego County  
My Commission Expires March 30, 1984