



**ENTERGY**

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January 30, 1995

U.S. Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, D.C. 20555

Attention: Document Control Desk

SUBJECT: Grand Gulf Nuclear Station Unit 1  
Docket No. 50-416  
License No. NPF-29  
Reply To A Notice Of Violation  
Compromise of Operating Examination Integrity  
Report No. 50-416/94-16-05 (GNRI-94/00250), dated 11/28/94  
Failure of Licensee to Ensure Operators Properly Reactivate Licenses  
Report No. 50-416/94-16-08 (GNRI-94/00250), dated 11/28/94

GNRO-95/00012

Gentlemen:

Entergy Operations, Inc. hereby submits the response to the Notices of Violation 50-416/94-16-05 and 50-416/94-16-08.

Notice of Violation 50-416/94-16-05 stated that Grand Gulf Nuclear Station (GGNS) had engaged in an activity compromising operating examination integrity. Notice of Violation 50-416/94-16-08 stated that two operators were incorrectly certified to meet the requirements for license reactivation. A review of these violations indicate no willful intent to violate any regulatory requirement and no direct violation of any GGNS procedure. These violations indicate that our procedures did not adequately ensure all requirements of 10 CFR 55 were met. We share your concerns regarding these issues and have commenced steps to prevent the recurrence of these infractions.

The inspector also expressed a concern with the method used to train operators in simulator scenarios versus how we actually operate in the plant. In particular, it has been our practice to conduct simulator training with three ROs, even though there are occasions when only two ROs are present on shift. We have decided that, when practical, an appropriate amount of time will be devoted to training/evaluating the shift with two ROs. Grand Gulf is aware of and promotes the philosophy of 'train as you operate-operate as you train' and feels that this method of training is the best way to fulfill that policy.

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The inspector was also concerned about the adequacy of controls for the duties of the persons used for Refueling SRO. To address this issue, GGNS has implemented a process which provides a list of active SROs and denotes any limitations such as 'refuel only'. This list is issued by Operations and is maintained in the Control Room.

Finally, the lack of a specific training program to cover refueling activities was a concern of the NRC inspector. GGNS currently has a training program in place which requires all personnel performing fuel movement activities to be Radiation Worker II qualified and to have read selected GGNS procedures related to refueling activities. Additionally, scheduled Refueling SROs have approximately eight hours of classroom training on refueling floor activities. GGNS considers this training to be adequate for refueling activities.

Please let me know if we can provide additional information regarding this violation.



Yours truly,

CRH/CDH  
attachment  
cc:

Mr. J. E. Tedrow (w/a)  
Mr. H. W. Keiser (w/a)  
Mr. R. B. McGehee (w/a)  
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**Notice of Violation 94-16-05**

10 CFR 55.49 requires that ... "applicants, licensees, and facility licensees shall not engage in any activity that compromises the integrity of any ... examination required by this part."

Contrary to the above, the facility licensee engaged in an activity that compromised the integrity of the operating examination for three operators. During the period September 6-9, 1994, the facility licensee directed three licensed operators to validate Job Performance Measures (JPMs) just prior to the start of their examination cycle with the knowledge that the JPMs would be used for those examinations. This resulted in the three operators familiarizing themselves (through validation activities) and rehearsal of 40 percent of their walkthrough examinations.

**I. Admission or Denial of the Alleged Violation**

Entergy Operations, Inc. admits to this violation.

**II. The Reason for the Violation, if Admitted**

In preparation for operator requalification examinations, a training department instructor selected 49 JPMs from a bank of 120 to be used during the walkthrough portions of the upcoming series of operator examinations. Prior to the start of the examinations, the JPMs were validated in accordance with the guidance of NUREG-1021. Most of the selected JPMs were validated via a 'desktop' procedure review by the instructor who chose the 49 JPMS. Validation of the remaining JPMs was performed/observed by a group of three licensed instructors. These validations were considered an opportunity to improve the skill level of the less experienced instructors in administering JPMs. Validations are conducted prior to each exam in order to ensure that the JPMs from the test bank have not been affected by a procedure change or plant design modification.

The 49 selected JPMs were used to make up ten exams containing five JPMs for the ten on-shift/off-shift groups. Since two of the five JPMs comprising all exams were of the group validated by the licensed instructors only a few weeks earlier, it was concluded by NRC staff that approximately 40 percent of the requalification walkthrough had been previewed and constituted an exam integrity issue. Although the individual who selected the JPMs was aware of the requirement for examination integrity, he did not realize that using the licensed instructors to validate JPMs could eventually result in a loss of examination integrity. Exam integrity at GGNS begins when the JPMs are selected and combined to make up an exam. Since the use of the licensed instructors to validate the JPMs prior to making up the exam did not violate any GGNS procedures, this incident indicates no willful intent to violate any regulatory requirement and no direct violation of any GGNS procedure.

Investigation of the incident revealed the root cause to be inadequate procedural guidance due to the applicable procedures not specifying the requirements of 10 CFR 55.49, '*Integrity of Examinations and Tests*'. In particular, they do not provide specific guidelines on how JPMs should be controlled during the validation and subsequent test preparation process.

III. **Corrective Steps Which Have Been Taken and Results Achieved**

Training Department personnel have been made aware of this incident. No further requalification exams are scheduled prior to the corrective action date shown below.

IV. **Corrective Steps to be Taken to Preclude Further Violations**

The Training Department will change existing procedural guidance by providing specific guidelines on how JPMs should be controlled during the validation and subsequent test preparations process.

V. **Date When Full Compliance Will be Achieved**

The above actions are scheduled to be completed by August 16, 1995 which is prior to the next scheduled requalification examination.

**Notice of Violation 94-16-08**

10 CFR 55.53(e) requires in part that "if a licensee has not been actively performing the functions of an operator or senior operator, the licensee may not resume activities authorized by a license issued under this part except as permitted by paragraph (f) of this section".

10 CFR 55.53 (f) requires in part that "if paragraph (e) of this section is not met, before the resumption of the functions authorized by a license issued under this part, an authorized representative of the facility licensee shall certify "the licensee has completed a minimum of 40 hours of shift functions under the direction of an operator or senior operator as appropriate and in the position to which the individual will be assigned. The 40 hours must have included a complete tour of the plant and all required shift turnover procedures."

Contrary to above, between October 1, 1993 and November 4, 1993, an authorized representative of the facility licensee incorrectly certified that two licensed operators, who had not been actively performing the functions of an operator or senior operator, met the requirements of 10 CFR 55.53(f) to resume activities authorized by their licenses who did not perform a complete tour of the plant. Specifically, a licensed operator and licensed senior operator resumed activities authorized by their license without performing a complete tour of the plant during the 40 hours of shift functions.

**I. Admission or Denial of the Alleged Violation**

Entergy Operations, Inc. admits to this violation. We should note, however, that the licensed Senior Reactor Operator did not resume activities authorized by his license, as stated in the Notice of Violation above.

**II. The Reason for the Violation, if Admitted**

Plant procedures require licensed personnel to comply with guidance as specified in administrative procedure 01-S-06-2. The procedure states that, for license reactivation, the operator shall complete 40 hours of 'parallel watch', perform a complete plant tour and document the fact that these activities have been completed. Although these individuals satisfied all procedural requirements, a review of the security logs indicated that a plant tour had not been conducted during the 40 hour period.

Interviews with one of the operators revealed that plant entries, performed as a part of preparation for NRC license examinations and as a part of plant familiarization, were considered by him to meet the plant tour requirement. The other operator stated that his watchstanding tours consisted of observation of preparations for upcoming infrequently performed plant evolutions and major equipment tear-down.

These misinterpretations of 10 CFR 55.53 requirements were due to inadequate procedures which did not clearly define a 'complete plant tour' and did not require that the tour be conducted as part of the 40 hour parallel watch period.

**III. Corrective Steps Which Have Been Taken and Results Achieved**

An investigation was initiated by GGNS to look at all individuals reactivating licenses within the past four years. This research identified similar misinterpretations of the required plant tour, scope and timing in a total of 5 cases (including the two individuals discussed in the Notice of Violation). No significant problems were found nor was there willful intent to violate regulatory requirements. These personnel have been coached on the correct interpretation of regulatory requirements for license reactivation. A quality deficiency report was initiated in order to address associated concerns and develop appropriate corrective actions.

**IV. Corrective Steps to be Taken to Preclude Further Violations**

Site procedures will be changed to include a definition of 'complete plant tour' and specify that the tour must be conducted during the time period encompassing the 40 hour parallel watch. License reactivation will be suspended until the procedure changes are complete.

**V. Date When Full Compliance Will be Achieved**

The above action is scheduled to be completed by April 15, 1995.