

MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

JAMES F. McLAUGHLIN JR.
VICE PRESIDENT

February 11, 1984

Mr. J. P. O'Reilly, Regional Administrator
U.S. Nuclear Regulatory Commission
Region 11
101 Marietta Street, N.W., Suite 2900
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-13
File: 0260/15521/0765
Review of Training Not Included
Within Scope of Recertification
Program
AECN-84/0100

On January 30, 1984, we met with Messrs. John Olshinski, David Verrelli, and Caudle Julian of your staff and presented to them the results of a recent comprehensive review of MP&L's programs for training not included within the scope of the recertification program. The purpose of this letter is to summarize that review and its results, present our conclusions regarding the adequacy of these training programs, and discuss MP&L's plans to apply additional attention to certain program areas.

Each Nuclear Production Department organization was directed to perform a review of its training programs. The following objectives were set for those reviews:

- 1) Verify the commitments relating to training.
- 2) Determine that training programs address all commitments;
- 3) Verify the status of implementation of these training programs.

We determined the training commitments for Quality Assurance, Nuclear Services, and Nuclear Plant Engineering were broad commitments deriving from 10CFR50 Appendix B, the Operational Quality Assurance Manual (OQAM), the Policy and Organization Manual (POM), ANSI N18.1 - 1971 and other ANSI standards governing the particular responsibilities of these organizations. The Emergency Plan also specified certain training for members of these organizations who were also members of the offsite emergency organization. All other training requirements were internally imposed. From the review, it

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was concluded that Quality Assurance, Nuclear Services, and Nuclear Plant Engineering had training programs governed by approved, written procedures which addressed all relevant regulatory and internal commitments. In each organization the training was implemented, functioning, and generally current with only minor exceptions as to currency having been identified and tracked for prompt correction.

Additionally, the review revealed the training programs for these offsite organizations are scoped to go beyond the minimum regulatory requirements. Training programs in these organizations have been established to increase the technical competence of the professional staff. The training provided includes not only a strong emphasis on GGNS and BWR technology but also provides access to specialized technical training. Training relating to the MP&L Quality Assurance Program and the respective organization's procedures is also included. The management of each offsite organization is directly involved in establishing training requirements, providing training opportunities, and generally ensuring training programs are effectively implemented.

As expected, the majority of specific training commitments address training of Plant Staff personnel. Numerous commitments are found in TSAR Chapters 9, 12.1, 12.5, 13.2, 13.3, 13.6, 16, and 18. These commitments fall into the following categories:

- 1) General Employee Training including radiation protection, security, fire protection, and emergency training;
- 2) Fire protection and fire fighting organization training;
- 3) Security Force training;
- 4) Radiation worker and respiratory protection training;
- 5) Emergency Organization training;
- 6) Specialized training for maintenance, health physics, chemistry, and technical personnel.

The details relating the specific commitments, the training programs established to address those commitments, and the status of those programs were contained in the meeting presentation material, and those details will not be discussed again in this letter.

The review of Plant Staff training programs shows a commitment to provide diverse, detailed technical training to maintenance, health physics, chemistry, and technical personnel. The training programs place emphasis on GGNS and BWR technology. In addition, specialized technical training and vendor schools are continually provided to develop and maintain the technical competence and independence of the Plant Staff. The impact of the reorganization of the Training Section is becoming evident. Additional instructors have been added for health physics and chemistry training.

An extensive revision of training programs for maintenance and non-licensed operators to address IKPO guidelines has recently been completed and implemented. Actions are being taken to upgrade Emergency Plan Training. All of these things are positive indicators that MP&L does in fact have a strong, sustained commitment to training at GGNS.

As a result of our review, it was concluded that with three exceptions, which will be discussed more fully later, regulatory commitments have been addressed and are met by training programs set out in approved, written procedures. Sufficient numbers of personnel have completed the various training programs, and training continues to ensure adequate numbers of trained, qualified personnel are maintained.

As stated previously, three training areas were identified as requiring additional emphasis to achieve complete compliance with regulatory commitments. These areas are:

1. Emergency Plan Training - The Emergency Plan specifies in Table 8.1 that dose assessment training and damage control and repair training will be required for certain supervisory personnel. Plant Administrative Procedure 01-S-04-21, "Emergency Preparedness Training Program," did not recognize these commitments. This training is scheduled to be complete by February 22, 1984.

Prior to this review, the Emergency Planning Coordinator determined that Emergency Plan Training was not current for several members of the onsite emergency organization. This matter was brought to the attention of the Vice President - Nuclear, and a memo was issued directing that the necessary training be completed. In a parallel action, MP&L Quality Assurance identified the same deficiency, and Corrective Action Request (CAR) 813 was issued. Corrective action is scheduled to be complete by February 22, 1984 for non-licensed personnel. For licensed personnel, we intentionally did not disrupt the operator recertification effort which is nearing completion in order to retrain these personnel in emergency preparedness. However, upon completion of the recertification program, all licensed personnel will complete any necessary emergency preparedness training prior to exceeding 5% rated power on GGNS Unit 1.

2. Diesel Generator Training - FSAR 13.2.1.1.16 and FSAR 13.2.1.2.13 require special training on the diesel engines for non-licensed operating and maintenance personnel involved with the emergency standby diesel generators. We currently have a number of non-licensed operators and maintenance personnel who have completed both Delaval and KPCS diesel schools. Until all non-licensed operators and maintenance personnel are trained, administrative controls will ensure only qualified personnel or personnel under the direct supervision of qualified personnel will operate and maintain the diesel generators. Training procedures for non-licensed operators and maintenance personnel have been revised to include special diesel engine training.

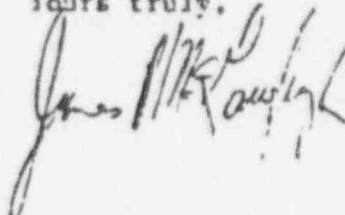
3. Required Reading - Chiefly to address FSAR 18.1.12, GGNS has a required reading program which provides information relating to operating experiences, plant changes, procedure changes, and the like, to operators and other plant personnel. The review indicated that while this large and complex program is generally functioning well, some sections of the plant organization are not current in required reading. Action is being taken to resolve these required reading backlogs in a timely manner.

In our review of MP&L procedural training requirements we noted that CAR 2054 had been written requesting that corrective action be taken to have Radwaste Operators complete their radwaste system qualification cards. All corrective actions relating to radwaste operator qualification cards are scheduled to be complete by February 21, 1984. It should be noted that the radwaste operator training and qualification program is an MP&L internal requirement aimed at meeting INPO guidelines. This program is not governed by any regulatory requirements.

Finally, FSAR 13.2.1.2.1, 13.2.1.2.2, 13.2.1.2.5, and 13.2.1.2.7 address training for selected personnel on control rod drive system maintenance, nuclear instrumentation, NSSS process instrumentation and control, and NSSS process computer. An adequate number of GGNS maintenance personnel have completed these various courses in order to meet the plant's needs. From this standpoint, the FSAR commitments are met. Maintenance practices direct that trained personnel be present during work on these special components. Administrative controls will ensure only qualified personnel or personnel under the direct supervision of qualified personnel perform complicated maintenance on these special components.

In conclusion, we believe the review clearly demonstrates that adequate training has been and continues to be provided. MP&L has expressed a strong commitment to training believing it is essential to safe and reliable plant performance. You are aware of the support and resources which MP&L has made available to the GGNS training organization. During 1984 Quality Assurance will perform one hundred percent audits of all licensed operator application training as well as normal audits of operator requalification training and other training programs that are the subject of this letter. Through these audits and through evaluations by INPO and ourselves, we will continue to monitor and control training to ensure our commitment to training excellence is undiminished. Should you have any questions, please call me.

Yours truly,



JPM:swb

cc: Mr. J. B. Richard
Mr. R. B. McGehee
Mr. T. B. Conner
Mr. G. B. Taylor

Mr. Richard C. DeYoung, Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

bcc: Middle South Services Nuclear Activities

Mr. A. Zaccaria

Mr. R. W. Jackson

Mr. R. D. Couse

Mr. J. F. Hudson, Jr.

Mr. T. H. Cloninger

Mr. T. E. Reeves, Jr.

Mr. J. E. Cross

Mr. S. M. Feith

Mr. A. R. Smith

Mr. A. G. Wagner

Mr. C. C. Hayes

Mr. M. D. Houston

Mr. J. F. Pinto

Mr. M. D. Archdeacon

Mr. L. F. Dale

Mr. W. E. Edge (w/2)

Mr. A. S. McCurdy

Mr. C. L. Tyrone

Mr. C. E. Hutchinson

Mr. J. W. Yelverton

Mr. D. L. Hunt

File (LCTS) (w/2)

File (Plant) (w/2)

File (Project) [6]

MEMO TO: F. E. Walsh
R. V. Moonaw
J. D. O'Staer
E. E. Wilson

FROM: C. R. Hutchinson

SUBJECT: Work on Plant Equipment

IPC-84/658

We are committed in the FSAR to obtain specialized training on maintenance of certain equipment at GCNS. Specialized training is required in:

- (1) BWR Control Rod Drive Maintenance [FSAR 13.2.1.2.1]
- (2) Nuclear Instrumentation [FSAR 13.2.1.2.2]
- (3) Process Instrumentation & Control [FSAR 13.2.1.2.5]
- (4) Process Computer [FSAR 13.2.1.2.7]
- (5) Diesel Engine Training [FSAR 13.2.1.2.13]

We have met our commitments in that we have trained selected maintenance personnel in the above areas. It is our policy at GCNS to utilize properly trained and qualified personnel for all maintenance activities. In keeping with the policy, you are requested to verify that mechanisms are in place to ensure that qualified personnel are utilized for all maintenance activities, and that work crews assigned to do maintenance on the equipment identified above contain at least one individual who is trained and qualified in maintenance of that equipment. (This may include the supervisor responsible for the job if he is closely supervising the work).

If you have any questions, please advise.


C. R. Hutchinson
Assistant Plant Manager - MAINT
2/14/84

CRH/vjc

cc: J. E. Cross
J. W. Yelverton
Plant File
File

MEMO TO: All Mechanical/Maintenance Supervisors

FROM: D. O. Staer

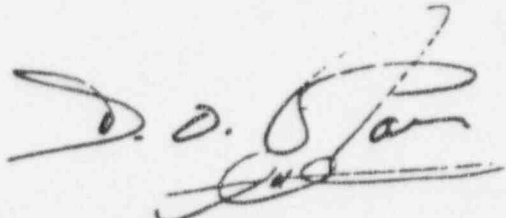
SUBJECT: AECM 84/0100

IPC-84/771

In keeping with the commitment to the N.R.C. by M.P. & L. pertaining to the training of non-licensed Maintenance Personnel, only qualified personnel, or personnel under the direct supervision of qualified personnel, will work on the Diesel Generators, or Control Rod Drive System as specified in the F.S.A.R.

It is also necessary, where at all practical, to use trained/qualified employees on a specific task of the nature qualified for.

This information is provided, as to present employee qualifications, on the chart posted in the Mechanical Supervisors' Office and in the Office of W. R. Boots, Assistant to the Superintendent. Compliance is requested and is Mandatory.



D. O. Staer
Mech/Maint. Supt.
2/18/84

DOS/mjh

cc: C. R. Hutchinson
F. H. Walsh
Plant File
Maintenance File

certified improperly. HUTCHINSON stated that mismanagement and substandard supervisory controls at the first and second levels of supervision in the mechanical maintenance department had also played a major role in the PF sheet certification problems. He stated that the PF sheet problems indicated a lack of attention to details by these levels of management and a lack of their involvement in the enforcement of the plant procedure. HUTCHINSON concluded that he did not probe into personality differences between mechanics and supervisors but said some mechanics and first line supervisors have either terminated with MP&L/GG or have been transferred to other divisions within the company because of apparent personality conflicts with Mechanical Maintenance Superintendent Dennis STAER.

END OF RESULTS OF INTERVIEW WITH CHARLES RANDY HUTCHINSON ON APRIL 12, 1984


Robert H. Burch, Investigator


MEMO TO: J. E. Cross

FROM: L. F. Daughtery

SUBJECT: NRC Exit Meeting Minutes 50-416/84-07

IPC: 84/2008

Attached is a copy of NRC Exit Meeting Minutes 50-416/84-07.


L. F. Daughtery
3/12/84

^{1/3}
JDE/LFD/jlc

cc: R. F. Rogers
J. W. Yelverton
~~C. P. [REDACTED]~~
D. L. Hunt
Plant File
NRC File 84-07

5/11/84

NRC EXIT MINUTES 50-416/84-07

Report Number: 50-416/84-07

Date: March 9, 1984

Date of Inspection: February 16 - March 9, 1984

Location: Plant Manager's Office

<u>Attendees</u>	<u>Titles</u>	<u>Organization</u>
A. G. Wagner	Senior Resident Inspector	USNRC
R. F. Rogers	Asst. Plant Mgr. - Ops	MP&L
J. W. Yelverton	Asst. Plant Mgr. - Support	MP&L
C. R. Hutchinson	Asst. Plant Mgr. - Maint.	MP&L
L. F. Daughtery	Compliance Superintendent	MP&L
D. L. Hunt	Training Superintendent	MP&L
J. E. Jones	Mechanical Training Supv.	MP&L

Areas Inspected

During the dates above, the inspector inspected the following areas: maintenance; surveillance testing; reportable occurrences; Technical Specification reviews; NRC open items; MP&L's Emergency Plan Drill exercise; and PSRC activities.

Results

Two (2) Notices of Violation will be issued and one (1) Unresolved Item.

Comments Made at Exit

The resident inspector informed MP&L that Plant Administrative Procedure 01-S-04-21 para 6.5.1 required that certain Emergency Preparedness Specialized Training be complete prior to one acting as an Emergency Response Team Member. He further informed MP&L, contrary to his review of qualification records of two maintenance personnel which were used as Response Team members during the March 8, 1984 exercise, he found that one member's training had expired and one member had never had any EPST. This will be cited as a violation for failure to comply with 01-S-04-21.

The inspector stated that MP&L's Quality Assurance Manual Policy 5 requires that activities affecting the safe operation of GGNS be prescribed and accomplished in accordance with documented instructions and procedures. However, per his review, he could not find any MP&L procedure dealing with the temporary assignments of personnel as stated in ANSI 18.1 para 3.1. This will be cited as failure to comply with the OQAM.

The following items were closed:

NRC Violation 83-43-03

LERs 83-143, 170, and 190; and 84-001, and 002

The resident inspector informed MP&L that an unresolved item would be issued based on his review of MP&L's implementation of Plant Administrative Procedure 01-S-04-17, "Mechanical Maintenance Retraining and Replacement Training Program". Based on his review, many questions had arisen pertaining to practical factors sheets being used to document the implementation of this program. The following questions were cited as examples of his concern:

- Numerous sign-offs had been completed within a short time. (As many as 10 in a day.),
- One individual has been signed off on his Practical Factors Sheet with a date which was prior to his employment with the company, and
- credit by exams were not supported by appropriate documentation.