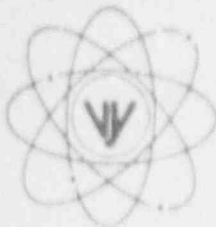


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March 26, 1992
TDL 92-07
BVY 92-34

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
One White Flint North
Room 14D7
Mail Stop 14D1
Washington, D.C. 20555

References: a. License No. DPR-28 (Docket No. 50-271)
b. Letter, USNRC to VYNPC, Inspection Report
No. 50-271-91-81, dated 1/27/92

Subject: Response and Corrective Actions to Deficiencies Identified by USNRC
During NUREG 1220 Audit

Dear Sir:

During the week of October 21, 1991, the NRC conducted a NUREG 1220 Audit Inspection at the Vermont Yankee Training Center and identified seven deficiencies in our training programs. Additionally, weaknesses in Training Department procedures (TDDs), Chemistry Technician theoretical knowledge, and instructor training were identified. Vermont Yankee's response and corrective actions to be taken for each item is addressed in the attachment to this letter.

Based on an overall analysis of the 1220 Audit Report and our own internal audits, it is our determination that the common factor that resulted in these deficiencies was a failure by management to maintain awareness of the administrative aspects of a systematic approach to training. This resulted in inadequate emphasis being placed on some of the key elements of the Vermont Yankee training system.

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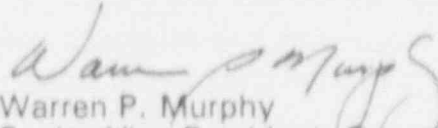
Page 2

On March 4, 1992, at a meeting with NRC regional staff, we discussed the many personnel actions we have taken to address these issues. Although the specifics are addressed in the attachment to this letter, we want to emphasize that Vermont Yankee is committed to maintaining a systematic approach to training. We are confident that the actions we have taken to date, in addition to the further corrective actions discussed in the attachment, will significantly improve our training system.

If you have any questions or require additional information concerning our efforts, please do not hesitate to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Warren P. Murphy
Senior Vice President, Operations

Attachment

cc: USNRC Region I Administrator
USNRC Resident Inspection - VYNPS
USNRC Project Manager - VYNPS

Attachment

Weakness: The team noted that new instructors were sometimes placed in the classroom prior to receiving instructor training.

VY Response: VY acknowledges this weakness and has been participating in a Northeast Training Association (NETA) project to develop a joint instructor training program. The first course will be taught in May 1992 and frequently enough thereafter to prevent a reoccurrence of this weakness. New VY instructors, requiring training, will attend this course prior to assuming classroom assignments.

Weakness: The Chemistry Laboratory at the training facility is not functional and has yet to be used for either initial or continuing training. This weakness could impact Chemistry Technician performance.

VY Response: VY has budgeted and approved funds for activating the Chemistry training laboratory. Work on completing the facility and ordering equipment will begin in April 1992. We anticipate that the lab will be ready for training by April 1, 1993.

Weakness: The team noted that theoretical knowledge varies widely among Chemistry Technicians.

VY Response: VY has identified specific areas of knowledge weakness and will be covering these areas in Chemistry Technician continuing training in 1992.

Deficiency
271/91-81-01: The task analysis are not kept current. It appears that a conscious management decision has been made not to maintain the task analysis data base.

VY Response: VY acknowledges that the task analysis and task-to-training matrices have not been kept up to date. We will conduct a complete review of the task listings for all accredited training programs and update the task analysis and task-to-training matrices by July 1, 1993. Additionally, to ensure that in the future that this deficiency does not recur, we will improve two feedback mechanisms, the Training Change Request (TCR) process by January 1, 1993, and the Curriculum Committee process by July 1, 1992, to include provisions for task inventory and analysis updates.

Deficiency
271/91-81-02:

The team noted that the Shift Engineer training program description did not include training in Emergency Plan implementation, Emergency Operating Procedures implementation, or use of Emergency Response Facility Information System (ERFIS). The incomplete program description is considered a deficiency.

VY Response:

VY acknowledges that the Shift Engineer Training Program description is incomplete. As was noted in the inspection report, however, Shift Engineers have received training in all of the above topical areas. VY is currently conducting a validation of the Shift Engineer task inventory and training program. The program description and task inventory will be updated by October 1, 1992. Any additional training resulting from this process will also be conducted by October 1, 1992.

Deficiency
271/91-81-03:

The loss of Chemistry Technician training completion data was identified during an internal audit by the licensee and confirmed by the team. This indicates a deficiency in the administration of individual training records.

VY Response:

This problem occurred during a change of personnel in the Training Department. Only one individual's records were lost and that individual has been retrained and retested in the affected areas. To minimize the possibility of a similar problem in the future, Training Department procedures have been revised to require records to be transferred to the records clerks in a timely manner. Both an internal and NRC review indicated that this was an isolated case. VY considers this problem to be resolved.

Deficiency
271/91-81-04:

The lack of clearly defined responsibilities and authority of personnel in the TDDs is considered a deficiency.

VY Response:

VY acknowledges that the Training Department Directives (TDDs) are inconsistent and are generally in need of improvement. Starting in April 1992, we will improve the quality of the TDDs to address this deficiency and the other weaknesses identified in the inspection report. Specifically, the TDDs will be restructured to provide more direct guidance on task analysis and other aspects of a systematic approach to training. Additionally, inconsistencies between TDDs will be eliminated. All TDD improvements will be completed by October 1, 1993.

Deficiency
271/91-81-05:

The team considers the lack of test items for each learning objective to be a deficiency. (This deficiency is in reference to the LOI program.)

VY Response:

This deficiency was discussed at length with the NRC at a meeting at the regional offices on March 4, 1992. Based on the discussion from this meeting we will review the Licensed Operator Initial training program and insure that each task/terminal learning objective can be evaluated by either written test questions, OJT guides, or simulator observations. Additionally, we will revise training materials to better distinguish between terminal and enabling objectives. This review will commence in April 1992 and the development of additional objectives and evaluation tools will be completed by October 1, 1993.

Deficiency
271/91-81-06:

The lack of predefined evaluation criteria for SEs performance in simulator training is considered a deficiency.

VY Response:

VY acknowledges that the Shift Engineers (SEs) should be formally evaluated in the simulator and we will develop evaluation criteria and an evaluation tool by October 1, 1992.

Deficiency:
371/91-81-07:

The team noted that...the annual program evaluations included recommendations for improvement. However, the recommendations are not prioritized or tracked to completion. The annual evaluations are highly variable in detail. The lack of a systematic method for generating and using the program evaluations is considered a deficiency.

VY Response:

VY acknowledges that the program evaluation process has not been fully effective. We will review the previous program evaluation recommendations and prioritize and track to completion any recommendations of merit that have not been pursued to date. This review will be completed by July 1, 1992. Additionally, we will review and improve this process to make it more effective. The review of the process and any necessary improvements will be completed by January 1, 1993 in order to facilitate next year's program evaluations.