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Report of Interview

[REDACTED] (OLS), Operations Branch (OB), Division of Reactor Safety, Region II, U.S. Nuclear Regulatory Commission (NRC), was interviewed relative to his knowledge of the events and circumstances concerning the Reactor Operator (RO) and Senior Reactor Operator (SRO) license applications and operator training deficiencies at the Grand Gulf Nuclear Station (GGNS). He provided the following information:

On December 17, 1982, Region II assumed responsibility for operator licensing activities at GGNS as well as all of the Region II facilities. He believed this responsibility was delegated by way of a letter on that date from Harold R. Denton, Director, Office of Nuclear Reactor Regulation (NRR), to James P. O'Reilly, Regional Administrator, Region II. Initially, NRR had received the GGNS RO and SRO license applications and reviewed them to see if they had been submitted in accordance with 10 CFR 55.10. From his knowledge and experience he believes that review is only to verify that the applications contain the information required by 10 CFR 55.10. To the best of his knowledge he does not recall ever verifying the accuracy of the information contained in the RO and SRO license applications while a member of OLB at Headquarters. He worked in OLB from October 1973 to August 1982 as a [REDACTED] and most recently as [REDACTED] OLB. He noted that the Chief, OLB, may have requested the Office of Inspection and Enforcement (IE) to verify such information; however, he has no specific knowledge of that.

In approximately mid to late January 1983, Region II received all the documentation concerning the RO and SRO applications, examinations, etc. for GGNS and all of the other Region II facilities. He noted that the documentation was contained in approximately 2000 folders. Upon receiving the documentation, specifically, the operator license applications, he had no reason to review them as that function had already been performed by OLB. He noted that applications are only reviewed when initially submitted to NRC or in the license renewal process. He noted that even if the applications had been reviewed again, there would have been no way through a direct review of the applications to detect the problems that eventually were revealed during Region II's Training Assessment/Inspection at GGNS on February 15-17, 1983.

The NRC personnel assigned to that training assessment were [REDACTED], [REDACTED], and [REDACTED], who resigned from the [REDACTED] late in 1983. This type of inspection/assessment effort was unique to NRC in that one like it had never been done before. He believes this assessment was an outgrowth of the previous problems identified in the later part of 1982 with the RO and SRO training programs at Brunswick Nuclear Power Station (BNPS). Those problems were associated with the competence of licensed

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by Mark E. Pesner *MP* Investigator, OTA Date dictated September 21, 1984

operators and were brought to Region II's attention as the result of some operational errors at BNPS on the part of Carolina Power and Light. He noted that O'Reilly liked the idea of a multi-disciplined review (including license examiners, inspectors, and the I&E training instructors) of the utility's training program. He believed the training assessment of GGNS was precipitated by the fact that GGNS was almost ready to receive a full power license to operate. The assessment identified one deviation and one violation as listed in Inspection Report 50-416/83-06 dated March 29, 1983.

He does not recall any discussions about the problems identified with RO and SRO license applications and related qualification cards being considered as an MFS by Region II, but noted that that [REDACTED] who participated in the February assessment probably mentioned the qualification card deficiencies to him. [REDACTED] believed the deficiencies were not significant in comparison with the other findings of the assessment team. Those findings were the Notice of Violation and the problem identified with the requalification training for RO's and SRO's at GGNS.

With respect to a six month delay between when the problem with the RO and SRO qualification cards was first identified to the time of the follow up inspection on August 15 - September 1, 1983, he said that he was not made aware of nor did he realize any significance to the problem with the qualification cards. Follow up on unresolved items such as the deficiencies with RO and SRO qualification cards noted during the initial training assessment would normally be conducted by the Resident or Regional Inspectors and not by OLS. Based on the information available at that time he had no reason to suspect the competence of the licensed operators at GGNS, but was concerned with the fact the requalification program had not been fully implemented. It was important to maintain the competence of ROs and SROs who were already licensed because they had not been able to operate GGNS due to the cold shutdown state of the reactor. It was necessary to demonstrate the skills and knowledge factors for which they had been trained and examined.

He recalls that there were generic discussions among members of Region II staff which probably included [REDACTED], Richard C. Lewis, Albert F. Gibson, John Olshinsky and James P. O'Reilly, concerning the licensee's failure to complete RO and SRO training commitments and its relevance to conducting RO exams and/or issuing RO licenses. He noted during those discussions that the failure on the part of the licensee to complete RO training would not necessarily preclude NRC from conducting RO license examinations, but would preclude issuance of RO licenses until all training requirements had been satisfied. He told them that it was dependent on the circumstances and significance of the training that had not been completed as to the fact of whether or not the applicant would be allowed to take the RO or SRO license examination.

Subsequent to the Region II follow up inspection on August 15-September 1, 1983, he was made aware of the fact that some of the GGNS licensed operators may not have completed all of the required training. Based on that information, he did not see the need to suspend, revoke, or modify the operator licenses of those individuals involved because (1) the status of the plant was less than five percent power, (2) the extent of the problem was inconclusive, and (3) he did not know if it was an actual failure to complete the required training or a documentation problem.

Between the follow up inspection of August 15-September 1, 1983, and the September 25, 1983, startup of GGNS, he does not recall anyone in Region II asking him to review or verify the competence of ROs and SROs as a result of the information learned about the apparent training deficiencies. He noted that at that time he was generally aware that GGNS could achieve five percent power, but was not cognizant of the plant's operating status on a day to day basis.

He recalls that on September 26, 1983, there was an OB meeting in Region II held by Albert Gibson, Chief, OB, to discuss the status of work related items in general. During the meeting one of the topics discussed was about the MFS issue concerning RO and SRO license applications and qualification cards deficiencies at GGNS being referred to the Office of Investigations (OI) for investigation. Gibson had said that in connection with these problems, there had been an enforcement panel in Region II and it had been deadlocked with respect to an appropriate enforcement action. He also noted that Gibson had said that O'Reilly apparently made a decision to refer the matter to OI for an investigation.

On October 31, 1983 through November 4, 1983, there was a second training assessment conducted of the RO and SRO training program at GGNS. As a result of that training assessment, there were two major findings. They were (1) deficiencies in the knowledge level of some operators in areas that had been signed off by MP&L on their qualification cards, and (2) qualification cards for four SRO candidates who had taken the September 26, 1983, license examinations had been completed in a highly unsatisfactory manner. He noted that this was the first time he personally had conclusive evidence that there were serious discrepancies in the manner in which the qualification cards had been completed.

He recalls discussions with Gibson concerning possible NRC action against the operator licenses at GGNS because of the problems with the qualification cards for the ROs and SROs, but does not recall when the discussions took place. As a result of those discussions, there were several meetings with MP&L during November 1983. There were internal Region II meetings on November 8, 9, 10, 1983. On November 11, 1983, there was also a meeting between MP&L and Region II concerning the overall qualifications of the licensed operators at GGNS. It was resolved at that meeting that MP&L would return to Region II on November 28, 1983, with their proposed solution to the problem. MP&L later agreed on November 18, 1983, to a total recertification program for all licensed personnel at GGNS.