

ORGANIZATION: GENERAL PHYSICS CORPORATION  
COLUMBIA, MARYLAND

REPORT NO.: 99901029/85-01	INSPECTION DATE(S): 9/10-11/85	INSPECTION ON-SITE HOURS: 45
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PRINCIPAL PRODUCT: Training Programs  NUCLEAR INDUSTRY ACTIVITY: General Physics is heavily involved in providing training and training related services to the nuclear industry.		
ASSIGNED INSPECTOR: <u>E.T. Baker for</u> <u>10/15/85</u> J. T. Conway, Reactive Inspection Section (RIS) Date		
OTHER INSPECTOR(S): P. Milano, Special Projects Inspection Section S. Showe, Technical Training Center		
APPROVED BY: <u>E.T. Baker for</u> <u>10/15/85</u> E. W. Merschoff, Chief, RIS, Vendor Program Branch Date		
INSPECTION BASES AND SCOPE:  A. <u>BASES</u> : 10 CFR Part 21  B. <u>SCOPE</u> : A sample of training programs and training related material was reviewed for conformance to General Physics internal procedures and other applicable quality assurance requirements.		
PLANT SITE APPLICABILITY: Not identified.		

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A. INSPECTION ISSUES:

On August 22, 1985, the Nuclear Regulatory Commission learned that a portion of a containment integrated leak rate testing (ILRT) course provided by General Physics Corporation (GP) in November 1983, contained some material which appears to suggest or condone practices that could mislead NRC inspectors.

The purpose of this inspection was to determine whether it is common practice for GP to include information of this type in training programs offered by them.

B. BACKGROUND INFORMATION:

GP conducted a two day course on Containment Systems Leakage Testing on November 29-30, 1983 for GPU employees at Oyster Creek. The visual aids used to teach this course contained a section entitled "Interaction with the NRC." This section contained material which appears to suggest or condone practices that could be misleading to the NRC program of inspection. Specifically, the following excerpts from the visual aids are examples of the objectionable material:

Should the utility inform the NRC of contemplated program changes? This is debatable.

Alerting NRC opens up utility for comments and second thoughts.

Springing changes on NRC has benefit of surprise.

Encourage [NRC] inspector to witness a Type C test, but... don't be foolish:

Note: \*Perform demo on an "easy" valve which has traditionally not been a "problem leaker"

\*NRC will want to concentrate on past problem areas and pet peeves.

Traditional industry approach to ILRT testing problems has been predicated on not stating to NRC:

When the test began (thus allowing for repairs after pressurization commenced)

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The "Type A" test failed (since some smooth talkers have managed to get out of failures)

We'll do it over (since it has been possible to obtain NRC agreement with such statements as, "you saw the test before and didn't comment; why this time when we've done it even better?")

\*These statements appeared in the revised (March, 1984) version of the course as well as the November, 1983 version.

GP instructors prepared the material for the subject course prior to conducting it for the first time at Oyster Creek and included a disclaimer following the viewgraphs in question which stated, "Discussion of the above experience should in no way indicate endorsement of any of the observed approaches."

The contents of the course and course evaluations were reviewed after the course had been given at Oyster Creek. The course was revised, as a result of this review, to remove most of the above material prior to the course being taught a second time on March 1 and 2, 1984, for employees of several utilities. The statement above marked with an asterisk remained in the March course. The course has not been taught since.

C. INSPECTION FINDINGS:

A biased sample of courses prepared and presented by GP was reviewed for material which could be construed as either suggesting or condoning practices that could be misleading to the NRC program of inspection. The sample was biased towards courses prepared by the two instructors who were responsible for the November, 1983 ILRT course.

The results of this review indicated that the November, 1983 ILRT course and a March, 1984 ILRT course which was given with modified, but not wholly satisfactory, material were isolated incidents. No other instances of similar material were noted based on the review of training materials and on interviews with seven instructors. In addition, it was clearly stated by both GP management and the instructors who were interviewed that it is not GP corporate policy to include such material in courses prepared and presented by company employees.

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Although an isolated incident, the inspection team concluded that the November, 1983 ILRT course was developed and presented with material that was in direct violation of corporate philosophy regarding interactions with the NRC because there is, in general, no formal quality assurance involvement in, and little management review of, the preparation of short courses (1-2 days). GP invoked corporate and quality review requirements based on the size of a contract, not necessarily its importance to safety.

D. OTHER FINDINGS AND COMMENTS:

a. Review of Training Materials

The course textbooks, outlines, and visual aids for numerous courses were reviewed for additional material which could be construed as suggesting or condoning practices that could mislead NRC inspectors. The courses reviewed include:

1. An Introduction to Code, Standards, and Regulatory Requirements
2. Inservice Testing Programs - Development and Implementation
3. Nuclear Licensing
4. Containment Systems Leakage Testing
5. Inservice Inspection Programs - Development and Implementation
6. Local Leak Rate Test Programs
7. IEEE Standards
8. Mechanical QC Inspector
9. Mitigating Core Damage (BWR)
10. Principles of Instructional Design: Instructor Training
11. Quality Assurance of Training Programs
12. Inservice Test Programs
13. Lead Auditor Training Program
14. Nuclear Licensing Engineering

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Although several of these courses had a section entitled "Interaction with the NRC," in no case was any information presented, other than in the November, 1983, and March, 1984, Containment Systems Leakage Testing course, that would be considered questionable. Typically, the type of information contained in the Interaction with the NRC section of the course involved the type of reports required, what information reports should contain, and when reports are required to be submitted.

b. Interviews with Instructors

The inspectors interviewed seven instructors to determine how training programs are developed and how corporate positions are reflected in courses. Based on these interviews, the inspectors concluded that an individual's work is reviewed by management based on the size (dollar) of the contract, rather than the work's potential impact on safety. Further discussion with representatives of management and a review of records confirmed that there is, in general, a lack of management involvement in the smaller projects produced by GP. The inspectors also concluded, based on these interviews, that all instructors were currently familiar with GP management's stated philosophy regarding interaction with the NRC (i.e., supportive of the NRC role) and that they supported it.

E. PERSONS CONTACTED:

R. Deutsch, President GP  
D. Roth, Group Vice President GP  
J. Zerbo, Executive Director GP  
J. Whitney, Vice President & CAO GP  
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