



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

PDR

August 12, 1985

50-395

DESIGNATED ORIGINAL

Certified BY _____

MEMORANDUM FOR: **Harold R. Booher**, Chief
Licensee Qualifications Branch
Division of Human Factors Safety

FROM: Alice H. Blumer *AB*
Personnel Qualifications Section
Licensee Qualifications Branch, DHFS

Mary L. Roe *MLR*
Personnel Qualifications Section
Licensee Qualifications Branch, DHFS

THRU: Julius J. Persensky, Section Leader *JJP*
Personnel Qualifications Section
Licensee Qualifications Branch, DHFS

SUBJECT: REPORT ON TRIP TO V. C. SUMMER NUCLEAR PLANT,
JULY 22 AND 23, 1985

On July 22 and 23, 1985, we conducted a limited training review at V. C. Summer as an incident follow-up on the February 21, 1985, high start-up rate and subsequent power range trip. We were accompanied by Dolan Falconer, Region II Inspector. Our objective was to determine whether the training program was in any way a contributing factor to the incident and further establish whether there might be any concerns related to INPO Accreditation. We used the new "Training Review Criteria and Procedures" (21 June 1985) to structure this incident-based review.

To summarize our analysis of the contributing factors in the incident and the plant staff's internally recommended corrections, we have prepared the following chart:

8508300461 XA

CONTRIBUTING FACTOR

LICENSEE'S SUBSEQUENT INTERNAL CORRECTIVE ACTIONS

1. STA made incorrect ECP Calculation
2. SRO assumed calculation correct; failed to watch instrumentation while trainee driving out to 100 steps (tripped at 75).
3. SRO failed to properly exercise vigilance over trainee.
4. TRAINEE was not qualified to perform this task.
5. TRAINING DEPARTMENT failed to properly prepare SRO for duties and responsibilities as OJT instructor.
6. TRAINING DEPARTMENT failed to maintain administrative control over sequencing of total training program thereby allowing performance of critical task during initial stage of training.
7. INPO ACCREDITATION PROCESS failed to detect the disconnect between plant-controlled OJT and the need to make OJT subject to the same scrutiny and administrative controls as other elements of the training programs being considered for accreditation.

1. Technique for calculating ECP's to be clarified; review of alternative methods of calculating xenon reactivity to be conducted; training program on the problem to be developed; curve book to be reissued with improvements in labelling of burnup windows; better methods of presentation (larger curves, tabulation of curves) to be investigated; procedures for development, review, approval and distribution of curve book and its contents to be developed.
2. Operating Experience Report (OER) to be included in "Required Reading" for training staff.
3. Short segment on duties and responsibilities of "Practical Factors Verifiers" to be rewritten for training and attendance made mandatory in Operator Requalification Training (SRO had missed this segment).
4. Licensee had not identified problem in writing or addressed corrective task actions other than that mentioned in #2 above.
5. Licensee had not identified problem in writing or addressed corrective actions other than that mentioned in #2 above.
6. Licensee had not identified problem or addressed corrective actions other than that mentioned in #2 above.
7. Not addressed.

August 12, 1985

-2-

Following our review, we strongly recommended to the licensee that OJT activities be recognized as part of the training function and that administrative controls be established over this function in order to avoid the breakdown in sequencing of learning that occurred here. In particular, we stressed that the SROs who conduct OJT duties receive performance-based training in the skills necessary to properly instruct, monitor and evaluate trainees performing critical skills such as those labelled "Practical Factors." In addition, these SROs should be listed as part of the training organization in their OJT capacity and should receive instructions concerning their duties and responsibilities as part of the instructional staff. Added to this was the recommendation that the training department maintain administrative control over sequencing of learning so that performance of a Practical Factors exercise would not be possible without a minimum of skills and knowledge acquisition by the trainee. Such controls would be similar to those which logically require that simulator training be scheduled late in the training sequence, a consideration that is not disputed by professional training staffs.

Two issues related to INPO Accreditation should be noted. First, the validation of plant-specific task information was a condition of Accreditation for V. C. Summer. When we attempted to trace the STA tasks back to the INPO task analysis in an attempt to review the relevant training for the STA, it was found that the INPO data base on the STA position was not available to the utility as it is apparently undergoing revision. The utility had not been aware of this and the training staff was not able to describe with certainty how or when INPO would inform utilities of changes so they could update their training. This experience with the STA task analysis base pointed to the fact that Summer has not yet validated all the relevant INPO task lists to make them plant-specific. There did not seem to be a timeframe for accomplishing this although the RO and STA programs we reviewed are already accredited by INPO.

A second issue related to INPO Accreditation is that of the OJT program as a whole. The program at Summer (and apparently at most utilities) seems to exist more as an operations function than a training function. As such, it manages to elude the established Accreditation criteria which are applied to the other programs such as simulators - which clearly are established as falling under the purview of the training function. Allowing this situation to occur seems to be a weakness which invites problems such as those described as contributing factors 3, 4, 5 and 6. These concerns should be discussed with INPO during our next quarterly information exchange meeting.

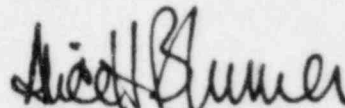
A concern raised by this issue is whether or not, given this type of situation, it is appropriate for the NRC to continue to allow Requalification credit to an SRO who "either manipulates the controls or directs the activities of individuals during plant control manipulations during the term

August 12, 1985

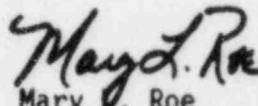
-3-

of their licenses" (10 CFR 55 App. A, 3.a). Although we did not specifically examine this issue, it seems appropriate to consider whether these two alternatives are interchangeable, as is implied in the regulation, or if the two represent entirely different sets of knowledge, skills and abilities. A study of outcomes such as the V. C. Summer incident could support a view that these two performance areas are both equally important and mutually exclusive.

We are most grateful to the Resident Inspector, C. W. Hehl, and Region II Inspector, Dolan Falconer, for their assistance and guidance during this review.



Alice H. Blumer
Personnel Qualifications Section
Licensee Qualifications Branch, DHFS



Mary L. Roe
Personnel Qualifications Section
Licensee Qualifications Branch, DHFS

cc: J. Hopkins, DL
D. Falconer, RII