

Northeast  
Utilities System

107 Selden Street, Berlin, CT 06037

Northeast Utilities Service Company  
P.O. Box 270  
Hartford, CT 06141-0270  
(203) 665-5000

March 3, 1997

Docket Nos. 50-213  
50-245  
50-336  
50-423  
B16253

Attachment 1 - Exempt From Public  
Disclosure Pursuant to 10CFR 2.790

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Haddam Neck Plant  
Millstone Nuclear Power Station, Units 1, 2 & 3  
Response to Initial Operator Licensing Examination Report No. 50-245/96-12

The purpose of this letter is to provide a Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) response to the NRC's Initial Operator Licensing Examination Report No. 50-245/96-12,<sup>(1)</sup> dated February 7, 1997. Specifically, during the week of December 2, 1996, the NRC administered initial examinations to seven senior reactor operator (SRO) applicants for Millstone Unit 1. Six of the seven applicants failed the examinations. Consequently, the NRC requested NNECO to submit the results of its root cause assessment of this performance during the initial examinations.

As a result of the operator licensing examination failures, the Recovery Officer - Nuclear Engineering and Support commissioned an Independent Review Team (IRT) to assess the circumstances surrounding the examination failures. A copy of the final IRT report

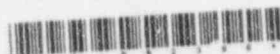
<sup>(1)</sup> G. W. Meyer letter to Bruce D. Kenyon, "Initial Operator Licensing Examination Report No. 50-245/96-12." dated February 7, 1997.

060046

change distribution NOAC  
NRC PDR

1 1w/o  
1w/o  
PDR

IE421



is enclosed as Attachment 1. The IRT report includes an analysis of the event, root and contributing causes, generic implications and recommended corrective actions.

In addition, the NRC Staff requested that NNECO and CYAPCO provide a summary of the investigations conducted to date regarding the inconsistencies in licensed operator training records. The summaries for the Haddam Neck Plant and Millstone Units 1, 2, and 3 are enclosed as Attachment 3.

The IRT concluded that the root causes for the examination failures were: 1) a lack of management oversight and accountability by management, supervisors, and staff; and 2) the corrective action program was ineffective in resolving previously identified, long standing issues. The IRT report also identifies several other contributing causes. To address the root causes and the various contributing causes, the IRT recommended a number of corrective actions. The complete corrective action plan, including a schedule for addressing each of the identified weaknesses, will be approved by CYAPCO and NNECO management and submitted to the NRC staff by April 2, 1997. As part of the corrective action plan, roles and responsibilities for completing NRC Form 398 will be clearly defined.

The IRT focused its assessment on the Millstone Unit 1 Operator Training Program; however, preliminary evidence suggested the potential for similar problems to exist in the training programs for Northeast Utilities' (NU's) other Connecticut nuclear units. Therefore, a review of the other units' training programs was initiated.

The deficiencies that contributed to the Millstone Unit 1 examination failures are identified in the IRT Report. The Nuclear Training Department (NTD) had previously conducted a less extensive review that found, among other things, that several major historical events associated with operator training occurred at times when staffing of the affected Operator Training group had fallen to unacceptable levels. This pattern seemed to hold true for the three Requalification Program failures in NU's past, as well as several lesser events. Inadequate staffing for the existing workload and insufficient experience in conducting operator training programs were significant factors in the Millstone Unit 1 examination failures.

While several of the contributing causes reported by the IRT would appear to be common among two or more of the Connecticut nuclear units, staffing problems went unmitigated only in Millstone Unit 1 Operator Training. Aggressive efforts to achieve a consistent level of line ownership and oversight, and to restore the Operator Training Branch to full staffing levels and to add experienced operator trainers in the process, are currently underway.

The IRT assessment included a review of the NTD records for each license applicant involved in the NRC examination that occurred during the week of December 2, 1996. To apply for a reactor operator (RO) or SRO license, the licensee must submit an NRC Form 398, "Personal Qualification Statement - Licensee," for each prospective license candidate. The form certifies that the candidate has successfully completed the facility licensee's requirements to be licensed as an Operator/Senior Operator pursuant to 10 CFR Part 55. Contrary to this, the audit results to date have revealed that the NRC Forms 398 were submitted to the NRC based on inaccurate information provided to those signing the forms.

Specifically, the IRT review identified several instances where the required facility training for SRO license candidates had not been completed. The requirements to complete the Licensed Operator Initial Training (LOIT) class included, in part, a set of on-the-job training (OJT) cards, five reactivity manipulations, and a specified amount of hours of under-instruction watch standing. Once these deficiencies were identified at Millstone Unit 1, the NTD established a team to investigate the matter further at Millstone Unit 1, the other Millstone units and the Haddam Neck Plant. The initial review scope was Millstone Unit 1 1996 Licensed Operator Upgrade Training (LOUT), 1995 LOIT; Millstone Unit 2 1996 LOIT and Millstone Unit 2 1996 LOUT; Millstone Unit 3 1995 LOIT and CYAPCO 1996 LOIT/LOUT. As part of the review process, when a deficiency is discovered, line management will review the deficiency and determine the necessary immediate corrective action(s), as appropriate, for the affected RO or SRO license.

The results of the initial reviews identified problems in the programs selected. A decision was made to expand the reviews to additional classes on all the units. The scope and results of the initial reviews will be submitted to the NRC by March 15, 1997. The final results of the expanded reviews will be submitted by April 2, 1997. Attachment 3 provides a summary of the reviews conducted to date.

Additionally, a review of the NRC Form 396 review process will be conducted to ensure completeness and accuracy. The scope of the review and its expected completion date will be included in our corrective action plan which will be submitted to the NRC by April 2, 1997.

As a final matter, the IRT report enclosed as Attachment 1 contains personnel information, the public disclosure of which would constitute a clearly unwarranted invasion of personal privacy. Accordingly, pursuant to 10 CFR 2.790(a)(6), NNECO requests that Attachment 1 be withheld from public disclosure in its entirety. An affidavit to support NNECO's request is attached. NNECO has prepared a redacted version of the final report, which is enclosed as Attachment 2. Consistent with 10CFR2.790(a)(6), the redactions from Attachment 2 have been made to protect

personal privacy, and consist primarily of the deletion of names and other identifying information.

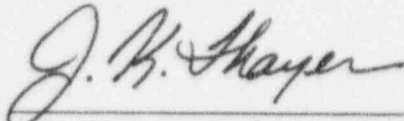
The following are CYAPCO's and NNECO's commitments made within this letter. Other statements within the letter are provided for information only.

- B16253-01 Submit the complete corrective action plan, including a schedule for addressing each of the identified IRT weaknesses to the NRC staff by April 2, 1997. As part of the corrective action plan, clearly define roles and responsibilities for completing NRC Form 398.
- B16253-02 Complete corrective actions for the Millstone Unit 1 LOIT/LOUT program prior to restarting respective classes.
- B16253-03 Complete corrective actions for the Millstone Unit 2 LOIT program prior to restarting LOIT classes.
- B16253-04 Complete corrective actions for the Millstone Unit 3 LOIT/LOUT program prior to NRC examinations of the current LOIT/LOUT class.
- B16253-05 Conduct a thorough review of the Millstone Unit 3 LOIT program against the accredited program requirements prior to submittal of the license applications to the NRC.
- B16253-06 Forward the scope of NRC Form 396 process review and its expected completion date for Millstone Units 1, 2 and 3 and the Haddam Neck Plant by April 2, 1997.
- B16253-07 Submit the results of HNP data reviews of LOIT/LOUT findings to the NRC by April 2, 1997.
- B16253-08 Submit the results of initial reviews of additional classes on all the units will be submitted to the NRC by March 15, 1997.
- B16253-09 Complete specific reviews of the HNP LORT program by April 4, 1997.

Please contact Mr. R. T. Laudenat at (860) 444-5248 should you have any questions regarding this matter.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY



---

J. K. Thayer, Recovery Officer  
Nuclear Engineering and Support Services

attachments (3)

cc: H. J. Miller, Region I Administrator  
G.W. Meyer, Chief of Operator Licensing, NRC Region I  
F. J. Miraglia, Acting Director, NRR  
W.D. Travers, PhD., Director, Special Projects Office  
W.D. Lanning, Deputy Director, Inspections, Special Projects Office  
P. F. McKee, Deputy Director, Licensing and Oversight, Special Projects Office  
J. P. Durr, Branch Chief Inspections, Special Projects Office  
M.B. Fairtile, NRC Project Manager, Haddam Neck Plant  
W.J. Raymond, Senior Resident Inspector, Haddam Neck Plant  
S. Dembek, NRC Project Manager, Millstone Unit 1  
T.A. Easlick, Senior Resident Inspector, Millstone Unit 1  
D.G. McDonald, Jr., NRC Senior Project Manager, Millstone Unit 2  
D.P. Beaulieu, Senior Resident Inspector, Millstone Unit 2  
J.W. Andersen, NRC Project Manager, Millstone Unit 3  
A.C. Cerne, Senior Resident Inspector, Millstone Unit 3



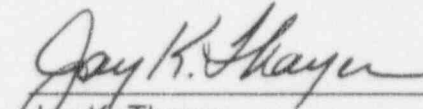
**AFFIDAVIT**

I, Jay K. Thayer, being duly sworn, depose and state as follows:

1. I am currently the Recovery Officer - Nuclear Engineering and Support with Northeast Nuclear Energy Company (NNECO). I am filing this affidavit in support of NNECO's request that Attachment 1 to the response to NRC Inspection Report No. 50-245/96-12 be withheld from public disclosure pursuant to 10 CFR § 2.790(a)(6).
2. The information contained within Attachment 1 contains personnel information, the public disclosure of which would constitute a clearly unwarranted invasion of personal privacy. The information identifies individuals who were involved with the matters being investigated. In NNECO's view, public disclosure of the information would invade the personal privacy of these individuals.
3. The personal privacy information contained in NNECO's response, to the best of my knowledge and belief, has not been disclosed to the public.

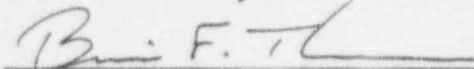
The above three paragraphs are true and accurate to the best of my knowledge, information, and belief.

Executed this 3rd day of March, 1997.

  
Jay K. Thayer

Subscribed and sworn to before me

this 3<sup>RD</sup> day of MARCH, 1997

  
\_\_\_\_\_

Date Commission Expires: Nov. 30, 2001

Docket No. 50-213

50-245

50-336

50-423

B16253

Attachment 2

Haddam Neck Plant  
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

Redacted Version

March 1997