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The Northeast Utilities System

April 4, 1997

Docket No. 50-213
B16374

Re: CAL 1-97-010

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

Haddam Neck Plant
Response to Confirmatory Action Letter

- References (a): H. J. Miller and W. D. Travers, USNRC letter to B. D. Kenyon, "Confirmatory Action Letter," dated March 7, 1997
- (b): J. K. Thayer letter to USNRC, "Response to Initial Operator Licensing Examination Report No. 50-245/96-12," dated March 3, 1997

In our letter dated March 3, 1997 [Reference (b)], we stated that the Connecticut Yankee Atomic Power Company (CYAPCO) directed that a specific review of the Haddam Neck Plant (HNP) Licensed Operator Requalification Training (LORT) program be performed. We stated that this review would be similar to the review performed for the Millstone Units and would be completed by April 4, 1997. This commitment is reflected in your confirmatory action letter 1-97-010 [Reference (a)] as commitment #9. Accordingly, Attachment 1 of this letter transmits the results of our review.

The following are CYAPCO's commitments contained within this letter. All other statements within this letter are for information only.

B16374-1 CYAPCO's LORT program will be continued while corrective actions are developed and implemented for the third category of discrepancies identified in the Adverse Condition Report.

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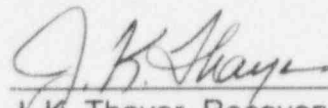


B16374-2 CYAPCO's LORT program will be terminated upon transition of the HNP operator licenses to a Certified Fuel Handler (CFH) status, at which time a CFH training program will be implemented.

Please contact Mr. W. J. Temple at (860) 437 5904 should you have any questions regarding this matter.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY



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

Attachment (1)

cc: H. J. Miller, Region I Administrator
G.W. Meyer, Chief of Operator Licensing, NRC Region I
F. J. Miraglia, Deputy Director, EDO, 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

Attachment 1

Haddam Neck Plant

Summary of Licensed Operator Requalification Training Findings

April 1997

Summary of Licensed Operator Requalification Training (LORT) Findings for the Haddam Neck Plant (HNP)

A review of LORT program activities against the Systems Approach to Training (SAT) based, accredited training program (used to meet the requirements of 10CFR 55.59) was conducted between March 17 and March 26, 1997. This review was requested by the HNP management on March 1, 1997, in response to similar reviews being conducted for the Millstone units. The review completed for HNP evaluated LORT program administration, content, attendance, evaluations (examinations), effectiveness reviews, the status of individual licenses (vis-à-vis personnel transfers following plant shutdown), and records completeness, against the requirements of the NU LORT Program Implementing Procedure (TPIP) and the plant-specific Training Program Description (TPD). The review was conducted by a supervisor and an instructor from two of the Millstone Units' operator training staffs.

Approximately thirty-five discrepancies were identified and have been documented through an Adverse Condition Report. The deficiencies were categorized by the nature of the required corrective actions, as follows:

1. Several discrepancies were administrative in nature, rather than departures from program requirements. Examples in this category included:
 - an individual who missed training during the LORT cycle which ended on December 19, 1996, did not drop his license until February 12, 1997. (This individual was out of work, due to illness, from December 16 to January 27. Soon after the license holder returned to work, the decision was made to terminate his Senior Operator license.)
 - based on a review of the LORT attendance summary matrix, it appeared as though 24 of 50 personnel missed training on "Feed MOV B96002." (This presentation was not an element of LORT; it was a practical session provided to selected operators who fulfilled a compensatory feedwater isolation watch at the plant.)
2. Several discrepancies were historical in nature and either did not require corrective action or are resolved by following program requirements on a going forward basis. Examples in this category included:
 - some licensed operators, who transferred to other NU operating companies following the permanent shutdown decision by CYAPCO, did not have letters submitted to the NRC on their behalf within the 30 days specified in 10 CFR 50.74. The letters have since been submitted to the NRC.
 - management observations of simulator training did not meet program requirements; specifically, there is no record of the Unit Director performing

any simulator observations in 1996. The simulator is no longer in use for training HNP licensed operators.

- one licensed operator missed an entire week of LORT prior to his retirement from the Company. This practice, which is not in keeping with CYAPCO's standards for attendance at LORT by licensed operators, has been specifically prohibited by a change to the LORT TPIP.

3. Several discrepancies require corrective actions in accordance with a Corrective Action Plan, as is developed through the Adverse Condition Report process. Examples in this category include:

- the as-found condition of the LORT program files did not readily support an audit, such that extended time was necessary to complete the desired review.
- several different attendance sheet formats were used during the period reviewed, and not all requested information was entered on each form.
- seven staff and administrative license holders did not attend a one-day refueling mode training session identified as Cycle 96-05. These individuals received equivalent training during a subsequent LORT cycle, but appropriate documentation was not prepared in a timely fashion.
- the current LORT TPD is out of date, in that it is four-and-one half years old, references sections of the NU Nuclear Training Manual which no longer exist, and is not reflective of the current CY LORT program which has been selected on a cycle-by-cycle basis to reflect the current plant condition.

CYAPCO management has determined that the LORT program is adequate, and will be continued while corrective actions are developed and implemented for the third category of discrepancies identified in the Adverse Condition Report. The LORT program will be terminated upon transition of the HNP operator licenses to a Certified Fuel Handler (CFH) status, at which time a CFH training program will be implemented.