



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

March 15, 1984

NUCLEAR PRODUCTION DEPARTMENT

U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 2900
Atlanta, Georgia 30303

Attention: Mr. J. P. O'Reilly, Regional Administrator

Dear Mr. O'Reilly:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-13/A
File: 0260/L-860.0
Confirmation of Action Letter
AECM-84/0145

Your Confirmation of Action letter to Mississippi Power & Light Company (MP&L), dated February 29, 1984, documented actions related to the Operator Recertification Program which had been or would be taken by MP&L. These actions included removing the six operators referenced in your letter from licensed duties, and providing a schedule for the completion of corrective actions for these six individuals. The purpose of this letter is to document the actions taken by MP&L in this matter and to provide the response required by your letter of February 29, 1984.

The subject six operators were removed from licensed duties effective February 29, 1984 and will not be returned to such duties until they satisfactorily complete an NRC administered requalification examination. The three operators that failed the simulator portion of the NRC requalification examination (OP-5854, OP-6121, and SOP-4216) have completed a retraining program and were re-examined by Region II personnel on March 12, 1984.

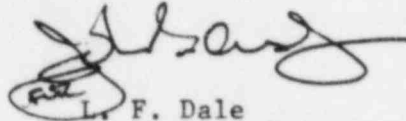
Two of the three operators that were not administered requalification examinations (SOP-4506 and SOP-4217) are scheduled to complete the program in time to be examined by Region II personnel on May 28, 1984. The remaining operator (OP-6241) did not successfully complete the program and will not be recommended for NRC re-examination at this time.

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It is MP&L's position that the information provided above meets the requirements of your February 29, 1984, Confirmation of Action letter. If you have any questions, please contact this office.

Yours truly,



L. F. Dale
Manager of Nuclear Services

REW/JGC:rg

cc: Mr. J. B. Richard
Mr. R. B. McGehee
Mr. T. B. Conner
Mr. G. B. Taylor

Mr. Richard C. DeYoung, Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

OBJECTIVE 2: ENHANCE OPERATOR TRAINING PROGRAM

Action Items

- 2.1 Strengthen Long-Term Operator Training Program
- 2.2 Strengthen Control Room Operator Training
- 2.3 Improve Qualification Card Program
- 2.4 Provide Technical Specification Training
- 2.5 Utilize Plant Specific Simulator for Regular Operator Training
and Power Ascension Training
- 2.6 Provide Instruction to Operations Personnel on Plant Modifications
- 2.7 Provide Training on Surveillance Program - Recent Changes

Overall Responsibility: Training Superintendent

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Actions Required:

1. Provide training for a significant increase in Operations personnel in order to produce a sufficient quantity of qualified ROs and SROs for shift manning and operations instructors.
2. Provide sufficient qualified personnel to instruct currently scheduled classes and to develop necessary programs and materials.
3. Develop excess SRO licensed individuals from the Operations ranks for the Training Department Staff.

Discussion:

Pursuant to these goals, the MP&L Training Department prepared a specification delineating the majority of training needs, requested proposals, evaluated bids and selected a qualified vendor. A letter of intent was signed with Quadrex Corporation in December, 1982, and work commenced in January, 1983. Anticipated contract duration is three years.

The MP&L Training Department is currently working with Quadrex on-site project management and instructors to ensure the existing training schedule is implemented on time. In addition, Quadrex personnel, both on-site and off-site, are developing programs and materials consistent with MP&L training needs. Development efforts on training materials begin with MP&L's guidance and direction on technical content and format, and continue with a submittal/review and comment/modification/approval cycle. The scheduling of the submittal and review cycle is done on an ongoing basis between Quadrex project management and MP&L training staff.

Quadrex tasks thus include instruction (simulator and classroom), development work on new programs and modification of existing programs, and special tasks to meet MP&L training needs. Currently, the majority of Quadrex tasks are directly related to operator training. The training functions performed by Quadrex will be assumed by the MP&L Training Department as a qualified training staff is developed.

Action Item Responsibility: Training Superintendent

<u>Task</u>	<u>Completion Date</u>	<u>Responsible Individual</u>	<u>Comments</u>
1. Produce sufficient quantity of ROs and SROs.			
1.1 Issue bid specification and addenda.	11/23/82	Training Supt.	Complete
1.2 Receive bids.	12/82	Training Supt.	Complete
1.3 Select vendor (Quadrex).	12/82	Training Supt.	Complete
1.4 Issue letter of intent.	12/23/82	Manager, Admin. & Business Serv.	Complete
1.5 Increase operator trainee budget to provide sufficient operator trainees and eventual licensed operators.	1/83	Training Supt.	Complete
2. Quadrex complete instructor staffing on site to meet scheduled training dates and continue developing training material to meet scheduled classes.	<u>Staffing</u> 4/15/83 <u>Development</u> Ongoing	Training Supt.	
3. Track recruiting and training efforts to ensure long range goal of sufficient ROs, SROs, and Training Instructors are met.	Ongoing	Training Supt.	

Action Item 2.2: Strengthen Control Room Operator Training

Action Required:

Provide information on plant modifications and significant GGNS and industry operating events to shift personnel on a routine basis and in a timely manner.

Discussion:

Training of operators will be provided to ensure that operating shifts receive the appropriate information and instruction. Pertinent modifications, LERs, SOERs, and other significant operating events will be provided to the Training Section by Nuclear Plant Engineering and/or Plant Technical Engineering (see Action Item 6.3). Scheduling and implementing such training will be coordinated between the Operations and Training Superintendents.

Action Item Responsibility: Training Superintendent

<u>Task</u>	<u>Completion Date</u>	<u>Responsible Individual</u>	<u>Comments</u>
1. Provide assistance from training staff to aid Operations in accomplishing the required training.	Ongoing	Training Supt./ Operations Supt.	

Action Item 2.3: Improve Qualification Card Program

Action Required:

1. Ensure that operators properly complete qualification cards.
2. Review qualification cards for effectiveness and modify program as necessary.

Discussion:

MP&L has developed comprehensive qualification cards for both licensed and non-licensed operators. These qualification cards were designed to improve the operators' knowledge of plant systems and components.

The qualification card program has not been as effective as was intended primarily due to the large number of signoffs on the qualification card and insufficient time on the part of qualified operators to give the required checkouts.

Action Item Responsibility: Training Superintendent

<u>Task</u>	<u>Completion Date</u>	<u>Responsible Individual</u>	<u>Comments</u>
1. Improve methods for tracking qualification card completion and provide personnel for proper checkouts/signoffs.	Prior to Commercial Operation	Training Supt./ Operations Supt.	
2. Perform a review of qualification cards and determine effectiveness as currently written. Revise qualification cards as necessary.	Prior to Commercial Operation	Training Supt./ Operations Supt.	

Action Item 2.4: Provide Technical Specification Training

Action Required:

1. Review existing training programs on Technical Specifications.
2. Upgrade existing training programs to provide more effective training.
3. Provide training on recent major changes to the Technical Specifications.

Discussion:

Training on GGNS Technical Specifications is included in various forms in existing training programs such as Licensed Operator Training, Licensed Operator Requalification Training, Shift Technical Advisor Training, and in the Required Reading Program.

As feedback becomes available on problem areas and training weaknesses in Technical Specifications, existing training programs must be reviewed and upgraded where necessary.

The effort currently in progress (see Objective 1) to revise Technical Specifications and associated surveillances will result in numerous changes. A training effort must be devoted to provide adequate training on these changes prior to the next criticality.

Action Item Responsibility: Training Superintendent

<u>Task</u>	<u>Completion Date</u>	<u>Responsible Individual</u>	<u>Comments</u>
1. Review existing training programs on Tech. Specs. and determine the effectiveness of current training based on feedback from plant staff supervision.	8/30/83	Training Supt.	
2. Upgrade existing training programs to provide more effective training.	12/30/83	Training Supt.	
3. Provide training to operators on recent major changes to Tech. Specs.	Prior to Next Criticality	Training Supt.	

Action Item 2.5: Utilize Plant Specific Simulator for Regular Operator Training and Power Ascension Training

Action Required:

Utilize the GGNS simulator for licensed operator training combining required manipulations and power ascension training procedures.

Discussion:

The GGNS simulator was delivered and installed in October, 1982. The first training class, combining licensed operator requalification manipulations and Power Ascension Testing procedures utilization, commenced January 17, 1983. Plans for simulator requalification training are designed to include all annually required manipulations (which may also be done on the plant), as many biennially required manipulations as practicable, and LER/SOER/multiple casualty-type scenarios for practice in "team concept" response.

MP&L has recognized the value of simulator training for licensed operators and license candidates in areas beyond the initial and requalification training programs. Consequently, it was decided to utilize the simulator for training of licensed operators in the utilization of procedures written for the plant's Power Ascension Testing. The entire Power Ascension Testing schedule was reviewed and a determination made as to which tests would be most beneficial in operator training and most applicable to simulator manipulation. Subsequently, weekly outlines and daily instructor guides were developed. Two five-shift cycles (one week duration per shift) covered the material to be taught. This simulator training not only provides valuable familiarization and practice with the procedures for the licensed operators but also allows excellent feedback on the applicability of the test procedures and their ease of utilization.

MP&L is continuing as scheduled with simulator training on Power Ascension Testing Procedures. Feedback is being provided via the licensed operators using the procedures. In addition, the Power Ascension Test Directors have participated in some of the simulator sessions, witnessing firsthand the application of their procedures. Thus, areas of weakness or unclear wording may be modified prior to actual implementation of the program at the plant.

Action Item Responsibility: Training Superintendent

<u>Task</u>	<u>Completion Date</u>	<u>Responsible Individual</u>	<u>Comments</u>
1. Conduct initial requalification training and power ascension training to all five operating shifts.		Training Supt.	
1.1 First training cycle.	Completed 2/18/83		Commenced 1/17/83.
1.2 Second training cycle.	3/25/83		Commenced 2/21/83.
2. Conduct remainder of annually required manipulations.	Prior to end of annual requalifica- tion schedule.	Training Supt.	Ongoing.

Action Item 2.6: Provide Instruction to Operations Personnel on
Plant Modifications

Action Required:

Provide information/training to Operations personnel describing changes in equipment/plant operations due to Design Change Package (DCP) implementation.

Discussion:

MP&L recognizes that Operations Personnel require instruction on changes in plant operations and equipment due to DCP implementation. The Training Department plans to instruct Operations personnel on plant modifications completed during the current outage on a system-by-system basis whenever practical.

In addition, prior to the next interval during which plant modifications resulting from DCPs are anticipated to be performed, training strategies for instruction on the changes must be established and implemented.

Action Item Responsibility: Training Superintendent

<u>Task</u>	<u>Completion Date</u>	<u>Responsible Individual</u>	<u>Comments</u>
1. Provide description of system changes to training.	As They Become Available	Tech. Support Supt.	
2. Provide revised Tech. Specs. and procedure revisions to Training.	As They Become Available	Tech. Support Supt.	
3. Prepare training material and train operations personnel for changes related to Tech. Specs. and systems required for the safe operation of the plant.	Prior to Next Criticality	Training Supt.	
4. Establish and implement strategies for training on future modifications as they are completed.	12/30/83	Training Supt./ Nuclear Support Manager/ Operations Supt.	

Action Item 2.7: Provide Training on Surveillance Program -
Recent Changes

Action Required:

Supplement the training program to provide appropriate plant personnel with Surveillance Program training.

Discussion:

An effort is currently underway to make major revisions to the Surveillance Program. MP&L recognizes that plant personnel must be trained on the program changes.

Action Item Responsibility: Training Superintendent

<u>Task</u>	<u>Completion Date</u>	<u>Responsible Individual</u>	<u>Comments</u>
1. Develop and implement training for plant personnel involved in surveillance activities.	Prior to Next Criticality	Training Supt.	
1.1 Provide training on history of problems associated with surveillances.	Prior to Next Criticality	Training Supt.	
1.2 Provide training on types of changes made to surveillance procedures.	Prior to Next Criticality	Training Supt.	
1.3 Provide training on changes made to the Surveillance Program.	Prior to Next Criticality	Training Supt.	
1.4 Provide training on how to evaluate results of completed surveillances.	Prior to Next Criticality	Training Supt.	This training will be for supervisors responsible for reviewing completed surveillances.

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