



HITACHI

GE Hitachi Nuclear Energy

Matt J. Feyrer
Site Manager,
Vallecitos Nuclear Center

6705 Vallecitos Rd
Sunol, CA 94586
USA

T 925 918 6018
Matt.feyrer@ge.com

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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555-001

Subject: GEH NTR Written Report to EN 55113 – Requalification Program Due Date Exceedance

References: 1) NRC License R-33, Docket 50-73

2) GE-Hitachi Event Report 55113, 2/24/2021

3) Vallecitos Nuclear Center (VNC) Technical Specifications for the R-33 Nuclear Test Reactor (NTR), 5/15/2007

In accordance with NTR Technical Specification 6.6.2(a)(2), Special Reports, GEH-Hitachi Nuclear Energy Americas, LLC (GEH) hereby submits a written follow-up report for Event Notification 55113 that was provided to the NRC on February 24, 2021 (Reference 2). As discussed in the initial event report, GEH reported that NTR operator requalification program due dates were exceeded for two licensed NTR operators.

Event Details and Safety Significance

On February 23, 2021, it was discovered that two licensed NTR operators had manipulated the plant between April 30, 2020 and July 20, 2020 without being fully qualified. The due dates for both operators' annual operating tests and biennial written tests were exceeded. During the period between April 30 and July 20, the reactor was operated normally by the two operators for a total of 41 startups and shutdowns.

Both operators passed all required exams in July 2020. The first operator's qualifications were fully restored on July 8, 2020, after having performed 13 startups and shutdowns while unqualified. The second operator's qualifications were fully restored on July 20, 2020, after having performed 28 startups and shutdowns while unqualified. No unusual occurrences occurred during operation of the NTR during these evolutions and at no time did the loss of qualifications cause the existence or development of an unsafe condition with regard to reactor operations or the health and safety of staff or the public.

Immediate Actions

- 1) The NRC Operations Center HOO was notified on February 24th (Reference 2) per NTR TS 6.6.2 as a deviation from TS 6.1.3.1, Minimum Staffing.
- 2) Reactor operations were discontinued for two days during which time the extent of the issue was determined and the full qualifications of all staff was reviewed and verified.

Cause of Event

This event was primarily the result of a human performance error and less than sufficient oversight of the NTR requalification program.

Historically, the NTR requalification program is tracked, managed, and administered solely by the NTR manager and completed in the first calendar quarter plus 30 days of each year. Typically, the last week of March and first week of April are targeted to complete the required exams and document reviews.

The VNC Site was shut down for COVID 19 on March 16, 2020. Limited NTR operations resumed on March 20, 2020, with a minimal NTR crew. A split crew schedule was implemented on March 30, 2020.

The NTR Manager attended the second half of one NRC conference call with the TRTR community between March 25, 2020, and April 1, 2020. He incorrectly concluded from that call that he had "more time" available in 2020 to complete requalification activities than in prior years due to industry wide COVID restrictions and what seemed to be impending NRC "blanket" exemptions to extend operator licensing activities.

Contributing to this event was a failure to establish backstops in the form of calendar-based prompts for critical license-related due dates. A similar event occurred at the NTR in 2016 (see EN51789). In that event, two operators unintentionally allowed their six-year licenses to lapse. Corrective actions for that event included establishing electronic calendar prompts in the available computer-based tracking tool (Gensuite Compliance Calendar) to remind individual operators every six years when their licenses were about to expire. While determined effective, the corrective action was also very narrow in that it only addressed six-year license expiration and only for the existing licensed staff. There was no consideration of adding calendar prompts for the requalification program nor was a process implemented to ensure six-year license expiration prompts were entered into Compliance Calendar for future operators.

Short Term Corrective Actions

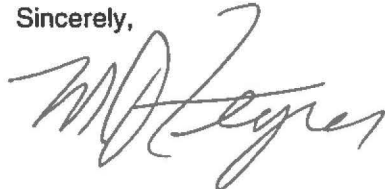
- 1) Condition Report # 36312 was initiated in the GEH Corrective Action Program to track additional findings, causes, and corrective and preventive actions.
- 2) An annual Compliance Calendar task was added for each operator to review and complete their requalification program requirements before their due date.
- 3) An annual Compliance Calendar task was added for the NTR Manager to schedule and complete all requalification program requirements before their due date.
- 4) An additional annual Compliance Calendar task was added to provide an independent review of the NTR requalification program requirements, to verify all associated compliance calendar tasks, and review the schedule for compliance with applicable procedures and guidelines.

Longer Term Preventive Actions

- 1) Develop and administer training for all licensed NTR operators on Requalification Program requirements of NTR SOP 9.14, ANSI/ANS 15.4 and NUREG-1478.
- 2) Revise Procedure SOP 9.14 to stipulate that a calendar-based tracking mechanism such as the Compliance Calendar be used to ensure timely completion of all requalification program requirements before their due date.

If there are any questions or additional information required, please contact me at the number above.

Sincerely,



Matt Feyrer, Site Manager
Vallecitos Nuclear Center

cc: D. Hardesty, NRR/DANU/UNPL

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