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Serial Number 1-1117

Mr. A. B. Beach  
Regional Administrator  
United States Nuclear Regulatory Commission  
Region III  
801 Warrenville Road  
Lisle, Illinois 60532-4351

Subject: Corrective Action Response to Operator Licensing Examination Report  
Number 50-346/OL-96-02

Dear Mr. Beach:

On December 23, 1996, Toledo Edison (TE) provided the initial response (Serial Number 1-1113) to Operator Licensing Examination Report Number 50-346/OL-96-02 (Log Number 1-3756). The initial response summarized the methodology utilized by the Independent Safety Engineering (ISE) unit in conducting a comprehensive assessment of why four candidates failed to achieve qualification as a Senior Reactor Operator (SRO). The assessment was completed by the ISE unit and the report was issued on December 20, 1996. On January 17, 1997, the Supplemental Response to the Operator Licensing Examination Report (Serial Number 1-1114) was submitted to the Nuclear Regulatory Commission (NRC) which summarized the primary root causes. Toledo Edison committed to provide the NRC with corrective action plans by February 20, 1997.

The supplemental response (Serial Number 1-1114) identified nine primary root causes for the candidates failure to achieve qualification as a SRO. The attachment to this letter, SRO Qualification Root Causes and Corrective Actions, provides the corrective action plan for each root cause described in the supplemental response.

Should you have additional questions or require additional information, please contact Mr. James L. Freels, Manager - Regulatory Affairs, at (419) 321-8466.

Sincerely yours,

*JK Wood by JH Paul*  
DLM/dlc 290018

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cc: A. G. Hansen, NRC Project Manager  
S. Stasek, DB-1 NRC Senior Resident Inspector  
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SRO QUALIFICATION ROOT CAUSES AND CORRECTIVE ACTIONS

Assessment of Remediation Program Activities

Formal and structured on-going assessment and remediation program activities were not adequate. Lacking well-documented historical data on candidate performance, decisions regarding candidate readiness were based on their performance on the final examination taken rather than their performance throughout the program as a whole. Remediation activities were focused on the last weaknesses shown instead of historical weaknesses. Documentation for the remediation program did not include specific criteria, other than the final examination, to support the decision for the candidates to be re-examined.

Corrective Action Plan: Guidance will be developed for periodic assessment of candidate weaknesses to ensure that past and current performance weaknesses of licensing candidates are identified and factored into the remediation plan for a license candidate. This guidance will include capturing historical data to ensure a more comprehensive and accurate representation of candidate weaknesses. Candidate progress reports will be periodically disseminated to key management personnel and will include historical data.

A formal process to document the basis for decisions to re-examine candidates will be developed and proceduralized. This will ensure consistent application of specific criteria by key management personnel prior to administration of a re-take examination.

Completion Date: Guidance for assessing candidate weaknesses, capturing historical data, and disseminating this information will be developed by May 30, 1997.

A formal process to document examination re-take decisions will be developed and proceduralized by June 30, 1997.

Standards for Candidates

Standards for verifying the candidates would be highly skilled and knowledgeable operators were weakened. This key issue is reflected in each of the causes discussed herein. Candidate selection and assessment standards are vital to the success of the candidates program. On two occasions, verification walk-throughs were conducted too early and were tailored to fit the candidate's training to date rather than evaluate all topics contained in the SRO Qualification Manual. Criteria for the performance of walk-throughs was not adequate to ensure the candidates had sufficient knowledge and skills to perform licensed duties and to be examined by the NRC.

Corrective Action Plan: Guidance will be enhanced to include prerequisites that the candidates must complete prior to performing verification walkthroughs. This will ensure that walkthroughs are conducted in the proper sequence within the candidates qualification process.

For conduct of walkthroughs, minimum expectations will be developed with respect to topics tested and the level of complexity, to provide a uniform evaluation instrument that tests to the desired level of performance.

Enhanced guidance and the identification of minimum expectations for conducting plant walkthroughs will be included in the qualification manual for SRO license candidates that have not been previously licensed.

Completion Date: This qualification manual will be revised by September 30, 1997.

#### Implementation of a New Approach to Training

A significant change to the initial license training group functional structure occurred within the past few years. The initial license training group was re-organized from a traditional "supervisory" led group to a "self directed work team". The dynamics and integration of the team members was not well implemented. This diluted the individual team members understanding of their responsibilities to the team. Post implementation monitoring of this new approach was not adequate to ensure that it was effective. No single individual had responsibility for the initial license candidates. This led to a lack of accountability that impacted communications concerning candidate weaknesses and led to ineffective candidate management.

Corrective Action Plan: The initial license training group organization was returned to a traditional supervisory led group to clarify roles and responsibilities, provide for a single point of contact, and more clearly define accountability and responsibility. The group previously functioned in a "self-directed work team" environment. The initial license training group now has a "Lead Instructor" who is responsible for the candidate's program and reports directly to the Supervisor-Nuclear Operations Training.

Completion Date: The initial license training group was reorganized into a traditional supervisory led group on December 5, 1996.

### Ownership of Candidates

In accordance with the Nuclear Training procedure for these candidates, the Nuclear Operations Training Program Lead is responsible for reporting the candidate's progress to the Operations Manager who in turn is responsible for ensuring the candidates maintain satisfactory qualification progress. However, the candidates job assignment reporting relationship was not transferred to the Plant Operations section. Ownership and accountability for the candidates was weakened.

Corrective Action Plan: All initial licensed operator candidates will be transferred to the Plant Operations section upon selection into the Licensing Program to enhance ownership of the initial license candidates qualification. An intra-company memorandum was issued by the Plant Manager to specify future policy with regard to selection of initial licensed operator candidates. One of the criteria stated was "an agreement to transfer to the Operations department while in training."

Completion Date: This policy was issued on January 16, 1997, when the Plant Manager disseminated intra-company memorandum DSP-97-00006, Instant Senior Reactor Operator License Candidate Selection Criteria.

### Candidate Selection

The desired goal for SRO license candidates is to strive to become highly skilled and knowledgeable operators. The training program for these candidates was adapted from an SRO training program that was long successful in meeting this goal. However, over time, the goal of some of the candidates shifted from striving to become highly skilled and knowledgeable operators to completing the program to enhance career opportunities.

Corrective Action Plan: Nuclear Training procedures specify the requirements for entry into licensed operator training programs. In addition to these criteria, an intra-company memorandum was issued by the Plant Manager to specify additional policies with regard to selection of initial license candidates. One of the criteria stated was "a desire to work in Operations as an on-shift licensed individual." The initial SRO license candidates will be integrated into the Plant Operations section to solidify the desired goal of the candidate to become a highly skilled and knowledgeable operator. Plant Operations management accountability for assessment of the candidates based on their potential to become future operators, and on-shift operators accountability for assessment of the candidate as a future peer will be enhanced. This will result in improving candidate motivation to become highly skilled and knowledgeable operators.

Completion Date: This policy was issued on January 16, 1997, when the Plant Manager disseminated intra-company memorandum DSP-97-00006, Instant Senior Reactor Operator License Candidate Selection Criteria.

Less Critical Candidate Performance Feedback than Required

A major initiative that Nuclear Training undertook was to improve the instructor/student relationship. This philosophy contributed to the instructors focusing immoderately on satisfying the initial license candidates desires. This led to instructors providing feedback to the students that was less critical than necessary to alter the students performance. Lack of critical feedback may have allowed behavior that did not meet the expectations and standards associated with licensed operator duties.

Corrective Action Plan: The importance of critical performance feedback to the candidates will be reinforced with simulator training instructors. Operations Training policy P-OPS-2, "Conduct of Simulator Training", was reviewed and it was verified that sufficient guidance was contained in this policy.

A process will be developed for Operation's management and Operations Training to monitor candidates performance during on-the-job training (OJT) to enhance the feedback to the candidates during OJT. This will provide timely feedback to the candidates on meeting performance expectations.

Operations will more actively participate in monitoring license candidate performance during simulator training. This will provide more opportunities for critiquing performance, clarifying expectations, and determining suitability for a license.

Completion Date: The review of the Conduct of Simulator Training policy is complete. The expectation that critical performance feedback will be provided to license candidates during simulator training will be reinforced by the Supervisor - Nuclear Operations Training with simulator training instructors by February 25, 1997.

The process for monitoring SRO licensee candidate performance during OJT and the simulator will be in place by September 30, 1997.

Training Focus

Because of the changed instructor/student focus, Training staff members may have placed too much effort on NRC testable material during the training of these candidates. As a result, the delivery of knowledge and skills needed to operate the plant was diminished.

Corrective Action Plan: The philosophy of training an individual to safely and competently operate the plant will be reinforced with all training instructors. This will ensure that the entire staff understands that the training focus is not to place excessive emphasis on NRC testable material, but to train an individual to be a safe and competent operator. Passing the NRC exam should be an expected result of a sound operationally oriented training program.

Completion Date: The training philosophy of training an individual to safely and competently operate the plant will be reinforced by the Supervisor - Nuclear Operations Training with the training instructors by February 25, 1997.

#### Attention to Detail Issues

Assessment of "attention-to-detail" issues for the students were not adequately monitored and reinforced. It became evident that, although some "attention-to-detail" issues were being identified and corrected, this process was not sufficiently documented to ensure the candidates were progressing satisfactorily.

Corrective Action Plan: Candidate performance on "attention-to-detail" issues will be monitored by Operation's management and Operations Training during the OJT process previously mentioned. Administrative exercises will be administered to SRO candidates during their OJT. A select number of these exercises will be "faulted" to ensure attention to detail is being evaluated.

The checklist used to monitor student performance during simulator training will be modified to include attention to detail issues. This checklist will ensure that attention to detail is routinely monitored and tracked.

Completion Date: The process for including administrative exercises in OJT is complete.

The checklist used to monitor student performance during simulator training will be modified by March 28, 1997.

The process for monitoring SRO candidate performance during OJT will be in place by September 30, 1997.

Training on Administrative Duties

Administrative duties for the SRO are initially covered during classroom training and further addressed during on-the-job training and simulator training. The current methodology for conducting classroom training on administrative topics did not provide needed practical exercises. Although administrative duties are addressed during OJT and simulator training, the candidates progress in administrative duties was not adequately emphasized in these training settings for these SRO candidates.

Corrective Action Plan: Classroom material will be reviewed by Operations subject matter experts (SMEs) to provide Operations SRO focus on administrative topics. The administrative lesson material will be modified based on the SME review.

Operations SMEs will participate in selected classroom presentations on administrative topics. This will provide administrative experience and expertise in the classroom environment.

As mentioned previously, administrative exercises will be included in the candidates OJT program.

Completion Date: The process for including administrative exercises in OJT is complete.

The classroom material will be reviewed by Operations SMEs by May 30, 1997.

Revisions of the classroom material will be completed by July 31, 1997.