



AEROTEST OPERATIONS, INC.

3455 FOSTORIA WAY • SAN RAMON, CA 94583 • (925) 866-1212 • FAX (925) 866-1716



July 13, 2000

Mr. Marvin Mendonca
U.S. Nuclear Regulatory Commission
PDNP
M.S. 11-B-20
Washington, D.C. 20555

50-228

Dear Sir:

Enclosed is the Operator Requalification Program for the Aerotest Radiography and Research Reactor which I have revised as per your recommendations in your letter dated Feb. 8, 2000.

If you have any questions feel free to contact me at 925-866-1212.

Sincerely,

Alfredo W. Meren
Reactor Supervisor

OPERATOR REQUALIFICATION PROGRAM
AEROTEST RADIOGRAPHY AND RESEARCH REACTOR

I. PURPOSE

A requalification program approved by the Nuclear Regulatory Commission is required per 10CFR55.59. The program shall be conducted for a continuous period not to exceed 24 months in duration and will be followed by consecutive 24 month programs.

II. LECTURES

Preplanned lectures will be given a minimum of 4 hours per month on a continuous basis in areas where operator and senior operator written exams and facility operating experience indicate a deficient knowledge in the subject matter. Individuals who score less than 70% in any category on the biennial written examination or annual operating test must be tutored to bring their performance up to a minimum of 70%.

The requalification program shall cover but not necessarily be limited to the following subjects:

- a. Theory and principles of operation.
- b. General and specific plant operating characteristics.
- c. Plant instrumentation and control systems.
- d. Plant protection systems.
- e. Engineered safety systems.
- f. Normal, abnormal, and emergency operating procedures.
- g. Radiation control and safety.
- h. Technical specifications.
- i. Applicable portions of Title 10, Chapter 1, Code of Federal Regulations.

III. ON-THE-JOB TRAINING

Each licensed operator and senior operator shall perform at least 10 reactivity control manipulations in any combination of reactor startups and shutdowns which demonstrate skill and/or familiarity with reactivity control systems. These shall be performed during the term of the operator's license period.

Each licensed operator and senior operator shall demonstrate a satisfactory understanding of the operating procedures in each area for which he is licensed.

Each licensed operator and senior operator will be cognizant of facility design changes, procedure changes, and facility license changes.

Each licensed operator and senior operator will review the contents of all abnormal and emergency procedures on a regularly scheduled basis.

IV. EVALUATION

Biennial written examinations and annual operating tests will be given to all operators and senior operators to determine the required content of the specific retraining programs for the following year which shall include the subjects described in Section II. These shall include but not be limited

to simulated emergency and abnormal conditions and how the operators respond to such conditions.

Operators or senior operators who score less than 70% overall on the written examination or operating test will be required to participate in an accelerated program and during such a program may continue to perform licensed duties. The accelerated course content and duration will depend upon the individuals' deficiencies.

V. RECORDS

Records of the requalification program will be maintained to document each licensed operator's and senior operator's participation in the program. These records will include copies of the written examinations given, the answers given by each licensee, and the results of evaluations and documentation of operating tests and of any additional training given in areas where operators and senior operators exhibited deficiencies.

VI. INACTIVE STATUS

If a licensee has not actively performed his licensed functions for a minimum of 4 hours per calendar quarter an authorized representative of the facility licensee shall certify that the qualifications and status of the licensee are current and valid and that the licensee has completed a minimum of 6 hours of licensed functions under the direction of an operator or senior operator as appropriate before resuming his licensed activities.

VII. EXAMINATION ADMINISTRATION

The Reactor Supervisor shall be responsible for the preparation, administration and grading of the written examination and operating test. These responsibilities may be assigned to another senior operator to enable the Reactor Supervisor to take the examinations during the next cycle.