

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL
(TEMPORARY FORM)

CONTROL NO: 3730

FILE: _____

FROM: Lowenstein, Newman, Reig Washington, DC		DATE OF DOC 4-4-75	DATE REC'D 4-7-75	LTR XX	TWX	RPT	OTHER
TO: Mr Gossick		ORIG one signed	CC	OTHER	SENT AEC PDR <u>XX</u> SENT LOCAL PDR <u>XX</u>		
CLASS	UNCLASS XXXXXXXX	PROP INFO	INPUT	NO CYS REC'D 1		DOCKET NO: 50-331	
DESCRIPTION: Ltr re their 1-14-74 ltr....trans on behalf of Iowa Electric Light & Power the following:				ENCLOSURES: Reactor Operators Training Program & Operators Requalification program..... (1 cy encl rec'd)			
PLANT NAME: Duane Arnold							

FOR ACTION/INFORMATION 4-9-75 ehf

BUTLER (L) W/ Copies	SCHWENCER (L) W/ Copies	ZIEMANN (L) W/ Copies	REGAN (E) W/ Copies
CLARK (L) W/ Copies	STOLZ (L) W/ Copies	DICKER (E) W/ Copies	LEAR (L) W/ Copies
PARR (L) W/ Copies	VASSALLO (L) W/ Copies	KNIGHTON (E) W/ Copies	SPELS W/ Copies
KNIEL (L) W/ Copies	PURPLE (L) W/ Copies	YOUNGBLOOD (E) W/ Copies	P. Collins W/ Copies

INTERNAL DISTRIBUTION

<u>REG FILE</u> NRC PDR OGC, ROOM P-506A GOSSICK/STAFF CASE GIAMBUSSO BOYD MOORE (L) DEYOUNG (L) SKOVHOLT (L) GOLLER (L) (Ltr) P. COLLINS DENISE REG OPR FILE & REGION (2) T.R. WILSON STEELE	<u>TECH REVIEW</u> SCHROEDER MACCARY KNIGHT PAWLICKI SHAO STELLO HOUSTON NOVAK ROSS IPPOLITO TEDESCO LONG LAINAS BENAROYA VOLLMER	<u>DENTON</u> GRIMES GAMMILL KASTNER BALLARD SPANGLER <u>ENVIRO</u> MULLER DICKER KNIGHTON YOUNGBLOOD REGAN PROJECT LDR <u>HARLESS</u>	<u>LIC ASST</u> R. DIGGS (L) H. GEARIN (L) E. GOULBOURNE (L) P. KREUTZER (E) J. LEE (L) M. MAIGRET (L) S. REED (E) M. SERVICE (L) S. SHEPPARD (L) M. SLATER (E) H. SMITH (L) S. TEETS (L) G. WILLIAMS (E) V. WILSON (L) R. INGRAM (L)	<u>A/T IND.</u> BRAITMAN SALTZMAN MELTZ <u>PLANS</u> MCDONALD CHAPMAN DUBE (Ltr) E. COUPE PETERSON HARTFIELD (2) KLECKER EISENHUT WIGGINTON
---	--	---	--	--

EXTERNAL DISTRIBUTION

1 - LOCAL PDR <u>Cedar Rapids IA</u>	1 - NATIONAL LABS	1 - PDR-SAN/LA/NY
1 - TIC (ABERNATHY) (1)(2)(10)	1 - W. PENNINGTON, Rm E-201 GT	1 - BROOKHAVEN NAT LAB
1 - NSIC (BUCHANAN)	1 - CONSULTANTS	1 - G. ULRIKSON, ORNL
1 - ASLB	NEWMARK/BLUME/AGBABIAN	1 - AGMED (RUTH GUSSMAN) Rm B-127 GT
1 - Newton Anderson		1 - J. D. RUNKLES, Rm E-201 GT
14 - ACRS HOLDING/SENT TO L.A. Teets		

LAW OFFICES
LOWENSTEIN, NEWMAN, REIS & AXELRAD

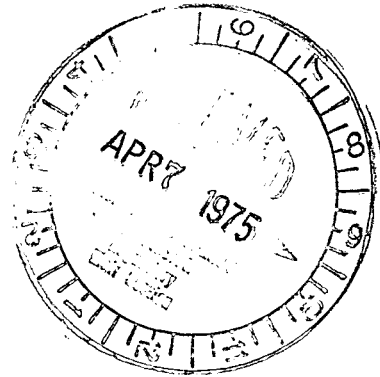
1025 CONNECTICUT AVENUE, N.W.

WASHINGTON, D. C. 20036

202 833-8371

April 4, 1975

ROBERT LOWENSTEIN
JACK R. NEWMAN
HAROLD F. REIS
MAURICE AXELRAD
KATHLEEN H. SHEA
J. A. BOUKNIGHT, JR.
ANTHONY J. GAMBARDELLA, JR.



Mr. Lee V. Gossick
Executive Director of Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Iowa Electric Light and Power
Company, Central Iowa Power
Cooperative and Corn Belt
Power Cooperative
Duane Arnold Energy Center
Docket No. 50-331

Dear Mr. Gossick:

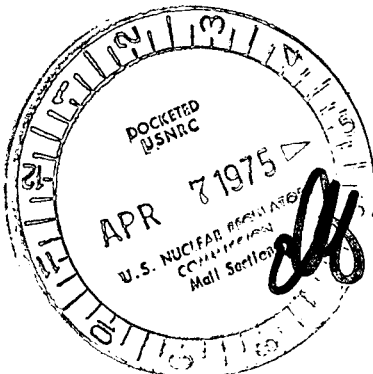
This is with reference to our letter of January 14, 1974, transmitting on behalf of the above-named Applicant, copies of the "Duane Arnold Energy Center Reactor Operator Training Program" ("Program") including the operator requalification program required by 10 CFR 55, Appendix A and our letters of January 25, 1974 and February 4, 1974, transmitting certain revisions of the program.

Pursuant to further discussions with your staff, certain additional modifications have been made in the program and these are set forth in the following revised pages transmitted herewith in forty (40) copies.

Page 5
Page 7
Page 8
Attachment 4

Sincerely,

Lowenstein, Newman, Reis & Axelrad
Lowenstein, Newman, Reis & Axelrad
Attorneys for Iowa Electric
Light and Power Company



3730

Licensed Operator Retraining Program

III.

A continuous retraining program will be conducted in order to keep operator and senior operator proficiency at a high level. This program will consist of the following:

A. Evaluation Examinations

1. Examinations will be administered to each licensed operator and senior operator at least annually. The Assistant Chief Engineer and Operations Supervisor shall not be required to take the annual examinations as they are directly involved in the preparation and approval process for the written annual examinations.
2. Reactor operator examination categories will be:
 - A. Principles of Reactor Operation
 - B. Features of Facility Design
 - C. General Operating Characteristics
 - D. Instruments and Controls
 - E. Safety and Emergency Systems
 - F. Standard and Emergency Operating Procedures
 - G. Radiation Control and Safety
3. Senior Operator examination categories will be:
 - H. Reactor Theory
 - I. Radioactive Material Handling, Disposal and Hazards
 - J. Specific Operating Characteristics
 - K. Fuel Handling and Core Parameters
 - L. Administrative Procedures, Conditions and Limitations
4. Each license operator or senior licensed operator failing to achieve an overall examination grade of 70% will be relieved of his licensed duties in a timely manner and will be required to participate in an accelerated requalification program. A judgment will be made by the Assistant Chief Engineer at the time of failure as to how the accelerated program may best be administered.
5. The following information in relation to evaluation examinations will become a permanent part of each license holders training file.
 - a. Copy of examination questions.
 - b. Copy of licensees answers and numerical grade given for that answer.
 - c. Licensees achieved grade on each exam section and his overall percentage grade. See attachment 1, page 1.
 - d. Recommendations for retraining on those sections that licensee fails to achieve a grade of 70 percent.

- a) Operating Instruction and Integrated Plant Operating Instructions
 - b) Applicable Administrative Control Procedures
 - c) Technical Specifications
 - d) Abnormal Occurrence Reports
 - e) Plant Design Changes
2. For each document entered, a sign-off sheet (attachment #3) shall be placed in the notebook to document review by all licensed personnel. Upon completing his review of a given document, each licensee shall sign, and date the applicable sign-off sheet indicating he has reviewed and understands the content of the document.
 3. Each shift supervising Engineer shall periodically review the sign-off sheets to insure satisfactory review progress by the members of his crew. The group discussion method is encouraged for members of the on-shift crews.
 4. The Operations Supervisor shall control the rate at which material is entered into the review notebook such that an annual review of the Emergency Instructions is assured.
 5. The following documentation relative to the review program shall be maintained by the Operations Supervisor and where applicable, become a permanent part of each licensee's training file:
 - a. Completed review program sign-off sheets.
 - b. An up-to-date index of all plant Operating and Emergency Instructions, and Technical Specifications, showing the date each was last reviewed (sign-off sheet completed).

D. Reactivity Control Manipulations

1. Each licensed Operator and Senior Operator is required to perform or direct at least ten significant reactivity changes, which demonstrate skill and/or familiarity with control systems, during the two year duration of his license.
2. A listing of the evolutions for which credit will be taken by 1) the operator performing the event and 2) the senior operator supervising the event is included in attachment #4. Every attempt will be made to obtain a mixture of these evolutions for the required ten significant reactivity changes.

3. Manipulations will be documented by each individual on the appropriate page of the Control Room Training Notebook (see attachment 1, page 3). This information will be incorporated into the individual training file by the Operations Supervisor.

E. Operating Experience

1. The Operations Supervisor shall ensure that all licensed personnel maintain adequate proficiency on plant controls. By scheduling all persons, who do not on a regular basis operate plant controls, for periodic shift operations their certification can be maintained.
2. Any person absent from operating duties for an extended period of time will be given a written evaluation examination and/or an oral examination to determine any areas in which he needs accelerated training prior to his return to operating duties. An extended period of time shall be defined as four (4) months.
3. All licensed personnel will be systematically evaluated at least annually by the plant management. The Assistant Chief Engineer and Operations Supervisor shall be exempt from the evaluation process as they will be responsible for conducting the subject evaluation. This evaluation will be performed and documented. See Attachment #5.

F. Additional Training

1. Any off-site seminars, classes, or demonstrations which contribute to a licensee's qualifications and are attended by those persons will be documented. See attachment #1.

SIGNIFICANT REACTIVITY CONTROL MANIPULATIONS

1. Any reactivity change resulting in a controlled reactor startup to the point of adding heat or reactivity manipulations during a plant shutdown.
2. Any reactivity control manipulation which results in a controlled heatup or cooldown rate of $\pm 50^{\circ}$ F/hr. or greater, when averaged over 1 hour.
3. Any reactivity control manipulation which results in an actual reactor thermal power change of 10% or greater.
4. Any movement of fuel into or from any core location.
5. Any use of an emergency procedure or transient condition where reactivity is changing.
6. Shutdown margin checks during core alterations.
7. Control rod drive scram and insertion tests.
8. Control rod sequence changes.

Attachment 4

Revised April, 1975