

DISTRIBUTION

Central Files NRC PDR/Local PDR
 OLB R/F
 WTRussell/LMiller (869437 & OLB-8)
 OLB Branch Chief (2)
 JNHannon
 RBEaton
 TLSzymanski
 NRR 869437
 HRDenton/RHVollmer
 JWClifford
 TMurley/WFKane, RI
 JGrace/AGibson, RII
 JKeppler/CPaperiello, RIII
 RMartin/EJohnson, RIV

DKirsch, RV
 JMartin, RV
 VStello
 FHuey, SRI
 HRood
 NDudley
 FMiraglia

OCT 31 1986

Mr. Kenneth P. Baskin, Vice President
 Southern California Edison Company
 P. O. Box 800
 2244 Walnut Grove Avenue
 Rosemead, California 91770

Dear Mr. Baskin:

Your letter dated June 20, 1986, claimed that NRC had imposed a new requirement on reactor operator candidates to be eligible for NRC license examinations. Specifically, Southern California Edison (SCE) was requested to provide evidence that each reactor operator candidate had completed five reactivity manipulations on the actual plant. You stated that this request was a change from applicable NRC regulations and past NRC practice and, therefore, constituted an improper backfit. For the reasons described in this letter and its enclosure, we conclude that this request is not an improper backfit.

The regulations, specifically 10 CFR 55.10(a)(6), require that applications for licenses contain "[e]vidence that the applicant has learned to operate the controls in a competent and safe manner ...". "The Commission may (emphasis added) accept as proof of this a certification of an authorized representative of the facility licensee where the applicant's services will be utilized. This certification must include details on courses of instruction administered by the facility license, ... and for reactors, the startup and shutdown experience received." NRC practice has been to require such a certification if a facility startup is not performed as part of the operating test identified in 10 CFR 55.23.

In October 1974, the NRC notified SCE of an alternate training program for applicants for an examination without a facility startup which required, among other items, five reactivity manipulations on the facility for which the license was sought. Accordingly, certification by SCE of completion of this alternate training program which included the five facility reactivity manipulations was acceptable proof that a candidate had learned to operate the controls and need not be tested for startup.

Since recent license applicants presented by SCE were not scheduled to conduct facility startups as part of the examinations, the NRC requested evidence that each applicant had conducted a minimum of five control manipulations on the actual plant. Such a request for evidence to permit the NRC to reach a conclusion regarding the need for a facility startup demonstration as part of the NRC examination is consistent with the regulations and staff practice and is not a backfit.

8802010047 861031
 PDR ADQCK 05000206
 PDR

OFFICE						
SURNAME						
DATE						

85-1240183

Mr. Kenneth P. Baskin

- 2 -

OCT 31 1986

Applicants that fall under the special provisions of 10 CFR 55.25, so called "cold" license candidates, may utilize a simulator to perform required control manipulations. This exception is permitted because: (1) the plant the candidates are licensing on is not available for reactivity manipulations prior to staff licensing requirements and (2) NRC approved cold license training programs are tailored to include special requirements such as extended simulator training and observation training at similar plants. The additional requirements and experience gained during startup testing are intended to compensate in some measure for the experience missed by the lack of operational availability of the plant they are being licensed on. However, 10 CFR 55.25 does not apply to "hot" license candidates; i.e., applicants for operating licenses after initial criticality. The staff reads the Commission's decision in Pacific Gas and Electric Company (Diablo Canyon Nuclear Power Plant, Units 1 and 2), CLI-84-5, 19 NRC 953 (1984), likewise to be limited in application to "cold" licenses. We can find no documentation that the AEC or NRC ever approved an SCE training program for operator or senior operator applicants after initial criticality of San Onofre 1, 2 or 3, that permits use of a simulator in lieu of the plant to meet the reactivity manipulation requirements of an alternate training program for "hot" license candidates. However, we did grant temporary verbal relief from these requirements in 1983 when Unit 1 was in an extended shutdown period which prevented license applicants from obtaining the reactor control manipulations during their licensed operator training program. On August 14, 1986, NRC reviewed the records for the first applicants after San Onofre 1 startup; i.e., the October 1984 license applicant training class. These applicants participated in the Unit 1 startup in November/December 1984. We found evidence of the required reactivity control manipulations in their training records.

You also claim that requiring evidence of control manipulations would pose an extensive, new administrative burden. During a recent audit of your accredited training program, the staff noted that this program requires extensive on-the-job training (OJT) and retention of records related to this OJT. Although you may not be keeping adequate records to document the five (5) reactivity manipulations requirement, it appears that your accredited training program includes a mechanism that with no additional administrative burden could document these practical factors during the candidates OJT.

In addition, as a result of your letter dated June 20, 1986, we have reviewed your training program submitted on January 22, 1985 in response to Generic Letter 84-14. The SCE training program last reviewed by the NRC (Section 13.2.2.3.1.c. of Amendment 24 to the FSAR dated April 1981) required "hands on" facility operation as part of replacement training for licensed operators. However, your January 22, 1985 program no longer requires "hands on" facility operation. For example, Item 4.2.2.4 of the Senior Reactor Operator/Control Room Supervisor Training Program and Reactor Operator/Assistant Control Operator Training Program proposes the use of a simulator to meet all facility reactivity manipulation requirements.

Additionally, Item 5.1.4.5 of the Senior Reactor Operator/Control Room Supervisor Training Program and Item 5.1.4.3 of the Reactor Operator/Assistant Control Operator Training Program equates simulator and facility

OFFICE									
SURNAME									
DATE									

Mr. Kenneth P. Baskin

- 3 -

OCT 31 1986

reactivity manipulations and allows simulator training to supplant power plant experience. In fact, your January 22, 1985 program no longer required any "actual hands on plant operating experience."

We understand that you may have made these January 22, 1985 program changes based on an NRC employee's incorrect response to a question regarding the use of simulators at an October 30, 1984 Region V Counterpart Meeting. However incorrect statements by NRC employees do not relieve licensees of the requirement to meet the regulations or the requirement to request review and approval of changes to their approved training programs. In addition, Generic Letter 84-14 requested submittal of SCE's current training program and stated that changes from the approved program were to be identified and the appropriate review fee submitted. Your January 22, 1985 submittal did not indicate any training program changes nor request NRC approval. However, as noted above, it appears that you have made changes that are not in accord with the previous NRC approved program.

In conclusion, NRC regulations require evidence that a license applicant has learned to operate the controls of the facility (i.e., change power or reactivity). The regulations do not specify a minimum number of control manipulations; however, staff practice has been to waive a reactor startup as part of the NRC examination if evidence exists that an applicant has performed five such control manipulations on the facility. As reflected above, the longstanding position is and has been specifically applicable to San Onofre. Your January 1985 change, made on the basis of a misunderstanding of NRC requirements or misinformation by an NRC employee, has not been accepted by the staff. Accordingly, the staff position about which your June 20, 1986 letter complains is not new or different from a previously applicable staff position.

Sincerely,

Original signed by:
Richard L. Vollmer

for
Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosure:
Eligibility Requirements for
Replacement Operators to
Sit for Examination Without
Reactor Startup

DW/EATON3/LTR TO BASKIN

OFFICE	DHFT:ALB	DHFT:ALB	DHFT:ALB	DHFT:D/DIR	DHFT:DIR	OGC	NRR:DIR
SURNAME	RBeatson:ah	JNJohnson	TSzymanski	BABoger	WTRussell	JScinto	RHoymer
DATE	10/14/86	10/14/86	10/14/86	10/14/86	10/14/86	10/ /86	10/31/86

HISTORY OF REQUIREMENTS FOR LICENSE APPLICANT'S EXAMINATION WITHOUT REACTOR STARTUP

On October 3, 1974, in a letter to all licensees, the AEC established a procedure for license applicants to sit for examinations without requiring a reactor startup providing the applicant had met three eligibility requirements. These requirements include: five reactivity changes on the reactor facility which he/she seeks a license; participation in an approved training program which includes training at a nuclear plant simulator; and certification from the simulator training center that four additional criteria relating to simulated reactor startup had been met. This policy was again published in Rev. 1 of NUREG-0094, "NRC Operator Licensing Guide," in July 1976, Appendix F.

In response to the H. R. Denton letter of March 28, 1980, and Item I.A.2.1 of NUREG-0737 of November 1980, licensees were to add additional reactivity manipulations to the licensed operator regualification program. The manipulations (Enclosure 4 of the Denton letter) included normal, abnormal, and emergency conditions. The manipulations could be done on the plant or a plant simulator. This letter did not approve use of a simulator for reactivity manipulations for license applicants.

When NUREG-1021, "Operator Licensing Examiner Standards," was published in October 1983, Standard ES-109, Eligibility Requirements for Reactor Operator and Senior Reactor Operator Candidates, included five significant reactivity changes and referenced Sections C.3 and C.4 in Appendix F of NUREG-0094.

Revision 2 of ES-109 published in April of 1986 clarified that manipulations of the actual plant (not a simulator) for five significant reactivity manipulations as described in the operator regualification program is necessary for an NRC operating exam without reactor startup. It further states that manipulations are not required if the operating examination includes actual startup of the reactor.