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 FACIL:50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
 AUTH.NAME AUTHOR AFFILIATION
 STARKEY,R.B. Carolina Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
 COLLINS,P.F. Operator Licensing Branch

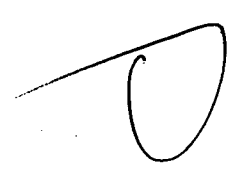
SUBJECT: Forwards 790911 ltr re proposed revisions to operator
 requalification program. Revisions enhance scope of program &
 will be incorporated effective 800101.

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NOTES:-----

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5/12/80

CP&L

Carolina Power & Light Company

J.J.H.

WHAT NEEDS
TO BE DONE?

P.L.C.

H. B. ROBINSON STEAM ELECTRIC PLANT
Post Office Box 790
Hartsville, South Carolina 29550

MAY 2 1980

Robinson File No. 2-0-4-c

SERIAL: RSEP/80-652

Mr. Paul F. Collins, Chief
Operator Licensing Branch
Division of Project Management
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, Maryland

SUBJECT: H. B. Robinson Unit No. 2 Operator Requalification Program
Letter Dated September 11, 1979

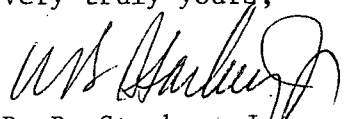
Dear Mr. Collins:

Please find enclosed the letter and proposed revisions that were sent to you in September, 1979. We feel these revisions enhance the scope of our requalification program.

Due to the time interval involved in receiving approval, Mr. Jerry Holman was contacted on May 1, 1980. He concurred that these revisions enhance our requalification program. Consequently, we are incorporating these revisions into our program with an effective date of January 1, 1980.

If you have any questions, please contact Mr. Charles Bethea (803) 383-4524 Extension 282 or to the undersigned at Extension 201.

Very truly yours,



R. B. Starkey, Jr.
General Manager
H. B. Robinson S.E. Plant

CAB:rm

Enclosure

M003
5/11

CP&L

Carolina Power & Light Company

SERIAL: RSEP/80-652

H. B. ROBINSON STEAM ELECTRIC PLANT
Post Office Box 790
Hartsville, South Carolina 29550

September 11, 1979

Robinson File No. 2-0-4-c

SERIAL: RSEP/79-941

Mr. Paul F. Collins, Chief
Operator Licensing Branch
Division of Project Management
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, Maryland

SUBJECT: H. B. Robinson Unit No. 2 Operator Requalification Program

Dear Mr. Collins:

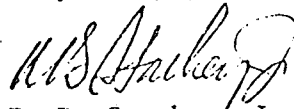
Please find enclosed the proposed revisions to the H. B. Robinson Unit No. 2 Operator Requalification Program.

The change will add a simulator training program. The evaluation from this program will be used in conjunction with the on-shift evaluation and periodic oral examination in satisfying the requirements of 10 CFR 55, Appendix A, Items 4c and 4d.

The licensed operators have been attending a simulator training program at the Harris Energy & Environmental Center in New Hill, North Carolina, for the present and previous year. The program has contributed to our operator requalification program and we desire to add it to our approved operator requalification program. This change will also clarify how the requirements of 10 CFR 55, Appendix A, Item 3C, are satisfied.

Please direct any questions you may have to Mr. Fred Lowery (803) 383-4524, Extension 282, or to the undersigned at Extension 201.

Very truly yours,



R. B. Starkey, Jr., Manager
H. B. Robinson SEG Plant

FLL:rmf

Enclosure

10-4

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Volume 1, Administrative Instructions
Section 10
Paragraph 10.1

SERIAL: RSEP/79-941

H. B. ROBINSON UNIT NO. 2

LICENSE DPR-23

10.2 OPERATOR REQUALIFICATION PROGRAM

September 11, 1979

H. B. ROBINSON'S OPERATOR REQUALIFICATION PROGRAM

H. B. Robinson's Requalification Program is designed to ensure that all licensed reactor operators and senior reactor operators will maintain proficiency in their assigned plant operating tasks. Further, it is expected that participation in this program will allow all licensed personnel to meet or exceed the requirements set forth by USNRC operator licensing group.

The following is a detailed summary of the H. B. Robinson's Operator Requalification Program which will be conducted to fulfill the requirements of 10 CFR 55. The full program will be implemented in such a manner as to minimize scheduling difficulties that will be incurred by plant management. It is the intention of CP&L to have a continuing training program between the time each annual examination is given. This consists of 2-4 months of formal lectures given weekly, if plant operation allows, a simulator training program, continuing with on-shift training through the remainder of the year. This will exclude the 1-3 months that the plant is down for maintenance and refueling.

The entire Requalification Program will be conducted in two (2) phases:

1. Retraining on-site, and
2. Operator evaluation

The Training Coordinator will be responsible for the scheduling and supervision of all training.

PHASE I - RETRAINING ON-SITE

The on-site portion of the Requalification Program will consist of approximately 120 hours of instruction. This instruction will be given in two (2) parts:

1. Formal classroom lectures, and
2. On-shift training

The scheduling on-site will be such that every licensed operator will have the opportunity to attend all lectures. The following is an outline of what subjects may be covered in each of these parts, but not necessarily in the order stated.

1. Formal Classroom Lectures

a. Theory and Principles of Operations

- 1) Atomic and nuclear physics
- 2) Subcritical multiplication
- 3) Xenon and samarium effects
- 4) Rod worth
- 5) Boron worth
- 6) Coefficients and defects
 - a) Moderator temperature
 - b) Fuel temperature
 - c) Voids

- d) Pressure
- e) Redistribution
- f) Power
- 7) Shutdown margin
- 8) Rod insertion limits

b. General and Specific Plant Operating Characteristics

- 1) Normal plant transients
 - a) Rod worth curves
 - b) Xenon transients
 - c) Step load changes
- 2) Safety analysis
 - a) Review of minor accidents
 - b) Review of major accidents

c. Plant Instrumentation and Control Systems

- 1) Excore nuclear instrumentation
- 2) Incore nuclear instrumentation
- 3) Full length rod control
- 4) Part length rod control
- 5) Rod position indication
- 6) Pressurizer pressure control
- 7) Pressurizer level control
- 8) Make-up water control
- 9) Steam dump control
- 10) Steam generator level control
- 11) Reactor protection system
- 12) Electrohydraulic control
- 13) All logics

d. Normal and Abnormal Procedures and Emergency Instructions

- 1) Engineered safety systems
- 2) Site emergency plan
- 3) Overall plant operating procedures

e. Radiation Control and Safety

- 1) Nuclear radiation
- 2) Biological effects of radiation
- 3) 10 CFR 20
- 4) Radiation protection manual
- 5) Radiation monitoring system
- 6) Radiation procedures

f. Technical Specifications

- 1) Safety limits, reactor core
- 2) Heatup and cooldown limits
- 3) Core power distribution
- 4) Discharge limits

g. Chemistry

- 1) Chemistry control
- 2) Radiation chemistry
- 3) Specifications and criteria

h. Quality Assurance Responsibilities

Annually a comprehensive examination will be given to each licensed operator. From the results of this exam an annual schedule will be formulated using the above topics as a guide. If any operator shows that he is clearly deficient in his performance (his examination results are less than 70% overall) he will be removed from work requiring an operator's license and placed in an accelerated requalification program until the management is satisfied that he is again proficient. This will be determined by a written and/or an oral examination.

Any operator who clearly shows he would have passed an NRC exam on a particular section (with an 80 percent or greater on that section) will be exempt from the lecture series on that section. If he scores less than 80% on a particular section, he will be required to attend a lecture series on that particular section. Upon completion of the classroom lectures a topical examination on that section will be given. A grade of 80% will be considered passing.

Certain licensed personnel, in the performance of their normal duties, may be very much involved with one or more of the areas covered in classroom lectures. These individuals would not be required to attend the applicable classroom lectures. In some cases, these individuals may be called upon to conduct lectures in their areas of expertise, i.e., Environmental and Radiation Control Supervisor for Radiation Control and Safety lectures.

2. On-Shift Training

On-shift training will be conducted in accordance with Volume 1, Administrative Procedures, Section 4.1.6, Shift Operations Readiness as described below:

"It is essential to individual and crew readiness that emphasis periodically be given to vital information on alarm settings, safety limits, abnormal condition symptoms for operation, operating sequences, and emergency immediate-action steps.

Individual reviews, instructional sessions, and where applicable, a walk-through of controls and instrumentation will be conducted with such duration and frequency that the information contained in the following volumes is covered once each quarter, with the exception of the 1-3 months during each operating cycle when the unit is being refueled:

- a. Volume I - Administrative Procedures - Section 4
- b. Volume V - Abnormal Procedures
- c. Volume VI - Emergency Instructions
- d. Volume VII - Precautions, Limitations, and Setpoints
- e. Volume VIII - Radiation Control and Protection Manual
- f. Volume XIII - Emergency Plan and Procedures

When covering the above six (6) volumes, the Technical Specifications, along with flow diagrams, logics, and functional diagrams will also be reviewed where applicable.

Before the end of every quarter (with the exception of the quarter in which the unit is being refueled), the Shift Foreman will submit to the Training Coordinator a report of the instructional sessions conducted during that quarter. The report will detail the information covered for each member of the shift operation crew, and will contain the Shift Foreman's judgment of each operator's familiarity with the information contained in the above volumes, as well as each operator's ability to take the required action.

The Training Coordinator will maintain a file of the reports filled out by the Shift Foremen. They will be used in compiling qualification information for NRC Reactor Operator license applications."

To insure that each licensed operator is cognizant of facility design changes, procedure changes, and facility license changes, significant safety related modifications or changes to procedures and license will be reviewed. This may be accomplished by group or individual review and documented in the training files. The staff personnel holding an NRC operator license will stand an average of four (4) hours watch in the control room per month. If he is regularly participating in a simulator training program, 75% of this time can be satisfied on the simulator. During this four (4) hours he will carry out those duties normally conducted by either the Shift Foreman or control room operator.

During all plant operations a record will be kept of any major reactivity changes a licensed operator will perform. The following is a list of some reactivity changes CP&L considers as major:

1. Startup to point of adding heat
2. Orderly shutdown
3. Manual control of S/G's during startup
4. Operation of EHC in manual during startup
5. Boration
6. Dilution
7. Operation of manipulator crane during refueling
8. Any power changes greater than ten (10) percent in manual rod control.

CP&L does not mean that the above list is complete. If credit is taken for any other major reactivity change other than those listed above, they will be documented fully.

A combination of 10 reactivity manipulations will be performed during the two-year period. Each licensed operator will either manipulate the controls or direct the activities of individuals during plant control manipulations. If the required number of reactivity manipulations cannot be performed on H. B. Robinson - Unit 2, a simulator with similar arrangement of the instrumentation and controls that reproduces the general operating characteristics of the Robinson Unit will be used.

PHASE II OPERATOR EVALUATION

At the completion of Phase I each licensed operator will take a USNRC type comprehensive written examination. Periodically a CP&L instructor will conduct oral examinations on 1 or 2 licensed operators.

Annually, each licensed operator will attend a simulator training program if scheduling permits. Any licensed operator not attending the simulator training program will be given an oral examination which includes a walk-through of controls and indications. The simulator used will have a similar arrangement of instrumentation and controls and will reproduce the general operating characteristics of the Robinson Unit. The program will be concluded with evaluation of the licensed operator performance during abnormal/emergency conditions.

The following is a list of records to be kept in a personal file on each licensed operator:

1. Startup, Shutdown, and Reactivity Changes
2. Formal Lecture Attendance
3. On-Shift Training
4. Grade Sheet for Periodic Examinations
5. Evaluation Sheets for Written Comprehensive Examinations
6. Evaluation Sheets for Oral Examination
7. Evaluation from Simulator Staff
8. Additional Training

In a master file will be copies of all periodic examinations and a copy of all comprehensive examinations given.

Any licensed operator absent from the site for a period of four (4) months or longer will be given a written examination and/or an oral walk-through of the plant to determine if an accelerated training program is necessary prior to returning him to his normal duties.

NOTE: The term "licensed operator" means any person holding an NRC license to operate a nuclear power plant, whether it be senior reactor operator or reactor operator.