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SUBJECT: Responds to NRC 830210 request for addl info re NUREG-0737,
 Items I.A.1.2.1.4, "Upgrading of Reactor Operator & Senior
 Reactor Operator Training & Qualification" & II.B.4,
 "Training for Mitigating Core Damage."

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Carolina Power & Light Company

MAR 17 1983

SERIAL: LAP-83-52

Director of Nuclear Reactor Regulation
Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
United States Nuclear Regulatory Commission
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
NUREG-0737, ITEMS I.A.2.1.4 AND II.B.4,
UPGRADING OF RO AND SRO TRAINING AND QUALIFICATION
AND TRAINING FOR MITIGATING CORE DAMAGE

Dear Mr. Varga:

Carolina Power & Light Company (CP&L) has received your request for additional information dated February 10, 1983 regarding NUREG-0737, Items I.A.2.1.4 and II.B.4 for the H. B. Robinson Steam Electric Plant Unit No. 2 (HBR2).

Your questions with our response to each question follow:

NRC QUESTION:

1. Item II.B.4 of NUREG-0737 requires that managers and technicians in the Instrumentation and Control, Health Physics, and Chemistry departments receive training in the use of installed equipment and systems to control or mitigate accidents in which the core is severely damaged. Please describe in detail your program to provide initial training and retraining in this subject to the personnel identified above.

CP&L RESPONSE:

The Maintenance Supervisor, Instrumentation and Control (I&C) foremen, and I&C technicians received initial mitigating core damage training at HBR2 during the Fall of 1981. This training was in two areas, process instrumentation and nuclear instrumentation. In the process instrumentation area the theory of operation, indications

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resulting from common failures and accident conditions, and back up instrumentation for important RCS parameters were discussed for the existing plant process instrumentation. In the nuclear instrumentation area the expected performance of the excore and incore detectors during an accident was discussed. Also, the use of the excore and incore detectors to determine core damage was discussed. Finally, the performance of the nuclear instrumentation during the TMI event was reviewed. This training took approximately 4 hours and was done at a level commensurate with the responsibilities of plant maintenance personnel.

The Manager - Environmental and Radiation Control, Environmental and Chemistry Supervisor and technicians, and Radiation Control Supervisor and technicians received initial mitigating core damage training of HBR2 during the fall of 1981. This training was in three areas, first, chemistry parameters during normal and accident conditions were discussed. Second, potential sources of gas generation, in particular hydrogen, were reviewed along with the hazards associated with such gas generation. Third, the radiation control aspects of dealing with an accident in which there is core damage was discussed. This training took approximately 4 hours and was done at a level commensurate with the responsibility of plant chemistry and radiation control personnel.

With respect to retraining we have reviewed NUREG-0737, Item II.B.4 and Mr. Denton's letter dated March 28, 1980, and have determined there is no requirement for retraining of managers and technicians in the Instrumentation and Control, Health Physics, and Chemistry Departments.

Even though there is no regulatory requirement, CP&L is currently reviewing this area to determine if retraining would be appropriate. If this review shows that retraining would be beneficial, it will be incorporated into the HBR2 training program.

NRC QUESTION:

2. Item C.2 of Enclosure 1 to Denton's March 28, 1980 letter defines criteria for requiring a licensed individual to participate in accelerated requalification to be the same as the passing grade for issuance of an NRC operating license which is 80 percent overall and 70 percent in each category. Operator Licensing Branch (OLB) interprets this criteria to require a complete reexamination if a person receives a grade of less than 70 percent in any two sections of the exam. Please describe how your operator requalification program meets the OLB grading criteria.

CP&L RESPONSE:

Volume 1 of the Plant Operating Manual, Administrative Instructions, Section 10.2 "Operator Requalification Program" requires that if an operator scores less than 70 percent on one and not more than two

categories, with an overall score of greater than 80 percent, he will be removed from licensed duties and will receive accelerated requalification and will be reexamined in those categories for which he scored less than 80 percent. If he scores less than 70 percent in three or more categories with an overall score of greater than 80 percent, he will be removed from licensed duties and will receive accelerated requalification and will be reexamined on the entire exam. If he scores less than 80 percent overall, he will be removed from licensed duties and will receive accelerated requalification and will be reexamined on the entire exam. The accelerated program will continue, in all cases, until the operator demonstrates that he is proficient in the subject categories. This will be determined by a written and/or oral examination.

NRC QUESTION:

3. The Robinson Administrative Instructions Section 10, Paragraph 10.2, allow any operator who "...clearly shows he would have passed an NRC exam..." on a particular subject (with a score of 80 percent or greater) to be exempt from lectures on that subject. Describe how this determination is made without requiring the operator to take a test on that subject.

CP&L RESPONSE:

Each operator is required to take an annual comprehensive operator exam developed by CP&L. This written exam is developed based on the NRC format. If an operator scores 80 percent or greater on the Company exam in a section, he has demonstrated that he would have passed that section of an NRC exam and is exempt from the lecture series on that section. If an operator receives less than 80 percent for a section on the Company exam, he is required to attend a lecture series on that section and retest that section.

NRC QUESTION:

4. Your letter to NRR dated May 18, 1982, provided responses to questions submitted by our letter dated April 13, 1982. The enclosure to your letter in response to Item 2 provided an organizational chart which included titles of personnel training on accident mitigation. The organizational chart in Section 6 of the Robinson Technical Specifications, Amendment 70 contains the position "Principal Engineer - Operations" which is not discussed in your response. It appears that this position is in the operational chain and could become involved in operating problems such as mitigating core damage. Please describe the training in mitigating core damage that this position will be provided to meet item II.B.4 of NUREG-0737.

Steven A. Varga

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CP&L RESPONSE:

The "Principal Engineer - Operations" is not in the direct chain from the Plant General Manager to the licensed operator, and as such requires no training as stated in NUREG-0737, Item II.B.4. However, the current person filling the "Principal Engineer - Operations" position has an SRO license and has therefore received the mitigating core damage training.

If you have any further questions regarding this matter, please contact a member of our Nuclear Licensing Unit staff.

Yours very truly,



S. R. Zimmerman
Manager
Licensing & Permits

DCW/mag (6330DCW)

cc: Mr. J. P. O'Reilly (NRC-RII)
Mr. G. Requa (NRC)
Mr. Steve Weise (NRC-HBR)