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 WHITE, L.D. Rochester Gas & Electric Corp.
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 CRUTCHFIELD, D. Operating Reactors Branch 5

SUBJECT: Forwards documentation of implementation of NRC 800828
 suggestions re operator licensing requirements. Shift manning
 requirements, resulting from TMI action plan, will be
 responded to in separate ltr.

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LEON D. WHITE, JR.
VICE PRESIDENT

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August 25, 1980

Director of Nuclear Reactor Regulation
Attn: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Five Additional TMI-2 Related Requirements
R. E. Ginna Nuclear Power Plant
Docket 50-244

Dear Mr. Crutchfield:

Darrel Eisenhut's letter dated May 7, 1980 contained licensee action items for operating reactors which are a result of the TMI Action Plan. We responded on June 13, 1980 to the enclosures of Mr. Eisenhut's letter concerning three of the five additional requirements. The remaining two requirements concerned shift manning requirements and licensing examinations. The shift manning requirements had not been published at the time of Mr. Eisenhut's letter but have recently been received and will be responded to in a separate letter.

Mr. Eisenhut referenced a letter dated March 28, 1980 as giving the requirements for operator licensing. The March 28 letter did not request a response although we implemented the suggestions in the letter. Attachment A to this letter documents how we implemented the operator licensing requirements.

Sincerely yours,

L.D. White, Jr.

Attachment

Asst
S. 11

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ATTACHMENT A
R.E. Ginna Power Plant
Unit No. 1
Rochester Gas & Electric Corporation

Response to NRC letter dated March 28, 1980
(Qualifications of Reactor Operators)

- NRC Item A.1.a: Applicants for senior operator licenses shall have 4 years of responsible power plant experience. Responsible power plant experience should be that obtained as a control room operator (fossil or nuclear) or as a power plant staff engineer involved in the day to day activities of the facility, commencing with the final year of construction. A maximum of 2 years power plant experience may be fulfilled by academic or related technical training, on a one for one time basis. Two years shall be nuclear power plant experience. At least 6 months of the nuclear power plant experience shall be at the plant for which he seeks a license.
- RG&E Response: Administrative Procedure A-102.13, R.E. Ginna NRC Licensing Training Program was revised on May 2, 1980 to incorporate the above items in step 3.1.2.
- NRC Item A.1.b: Applicants for senior operator licenses shall have held an operator's license for 1 year.
- RG&E Response: Administrative Procedure A102.13, R.E. Ginna NRC Licensing Training Program was revised on May 2, 1980 to incorporate this requirement in paragraph 3.1.2.5.
- NRC Item A.2.a: Senior Operator: Applicants shall have 3 months of shift training as an extra man on shift.
- RG&E Response: Administrative Procedure A-102.13, R.E. Ginna NRC Licensing Training Program was revised on May 2, 1980 to incorporate this requirement in paragraph 3.2.3.2.1.
- NRC Item A.2.b: Control Room Operator: Applicants shall have 3 months training on shift as an extra person in the control room.
- RG&E Response: Administrative Procedure A-102.13, R.E. Ginna NRC Licensing Training Program was revised on May 2, 1980 to incorporate this requirement in paragraph 3.2.3.1.1.



NRC Item A.2.c: Training programs shall be modified, as necessary, to provide:

- 1) Training in heat transfer, fluid flow and thermodynamics.
- 2) Training in the use of installed plant systems to control or mitigate an accident in which the core is severely damaged.
- 3) Increased emphasis on reactor and plant transients.

RG&E Response: Administrative Procedure A102.13, R.E. Ginna NRC Licensing Training Program was revised on May 2, 1980 and the above topics were added to the technical training in step 3.2.1.

NRC Item A.2.d: Training Center and facility instructors who teach systems, integrated responses, transients and simulator courses shall demonstrate their competence to NRC by successful completion of a senior operator examination.

NRC Item A-2e: Instructors shall be enrolled in appropriate requalification programs to assure they are cognizant of current operating history, problems, and changes to procedures and administrative limitations.

RG&E Response: Administrative Procedure A-102.14, R.E. Ginna Operator Requalification Program was revised May 21, 1980, and the requirements of A.2.d and A.2.e are included in step 8. The program has been submitted to OLB for review.

NRC Item A.3: Facility Certifications

Certification completed pursuant to sections 55.10 (a) (6) and 55.33a (4) and (5) of 10 CFR Part 55 shall be signed by the highest level of corporate management for plant operation.

RG&E Response: It has always been and will continue to be the policy of R.E. Ginna that all certifications and license renewals be requested and signed by the Vice President of Electric and Steam Production.

NRC Item B: NRC Examinations

RG&E Response: No response is required. These actions are to be taken by the NRC.

NRC Item C-1: Requalification Program

Contents of the licensed operator requalification program shall be modified to include instruction in heat transfer, fluid flow, thermodynamics and mitigation of accidents involving a degraded core.

RG&E Response: Administrative Procedure A-102.14, R.E. Ginna Operator Regualification Program was revised on May 21, 1980, and the above instruction requirements were added to classroom lectures in step 3.

NRC Item C-2: The criteria for requiring a licensed individual to participate in accelerated regualification shall be modified to be consistent with the new passing grade for issuance of a license; 80% overall and 70% each category.

RG&E Response: Administrative Procedure A-102.14, R.E. Ginna Operator Regualification Program was revised on May 21, 1980 with these new criteria added in step 7.

NRC Item C-3: Programs should be modified to require the control manipulations listed in Enclosure 4. Normal control manipulations, such as plant or reactor startups must be performed. Control manipulations during abnormal or emergency operations must be walked through with, and evaluated by, a member of the training staff at a minimum. An appropriate simulator may be used to satisfy the requirements for control manipulations.

RG&E Response: Administrative Procedure A-102.14, R.E. Ginna Operator Regualification Program was revised on May 21, 1980, and the manipulations listed in Enclosure 4 were added in steps 2 and 4.

NRC Item D: Long Range Criteria and/or Requirements

These criteria and requirements require additional staff work and/or rulemaking prior to their implementation.

RG&E Response: The long range criteria and requirements are being considered for future inclusion in training programs. The commission's interest in keeping utilities informed of future changes is appreciated.

