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 SCHWENCER,A. Licensing Branch 2

SUBJECT: Discusses need for shift advisors following plant heatup.  
 Advisors presently unnecessary, based on Industry Working  
 Group 840224 proposal. Senior reactor operators will satisfy  
 criteria of License Condition 15.

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## Washington Public Power Supply System

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P PDR

October 16, 1984  
602-84-540

Docket No. 50-397

Director of Nuclear Reactor Regulation  
Attention: Mr. A. Schwencer, Chief  
Licensing Branch No. 2  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

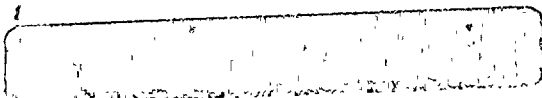
Dear Mr. Schwencer:

Subject: NUCLEAR PLANT NO. 2  
SHIFT ADVISOR, TERMINATION OF NEED FOR

- References:
- 1) Letter, N.J. Pallodino (NRC) to J. H. Miller (Georgia Power), "Acceptance of Industry Working Group Proposal of February 24, 1984", dated June 14, 1984
  - 2) Industry Working Group Proposal of February 24, 1984 "Industry Evaluation of Operating Shift Experience Requirements" presented to the NRC Commissioners by J. H. Miller, President, Georgia Power Company et al.
  - 3) Generic Letter 84-16, D. G. Eisenhower (NRC) to All Licensees of Operating Reactors, Applicants for Operating License, and Holders of Construction Permits, "Adequacy of On-Shift Operating Experience for Near Term Operating License Applicants", dated June 27, 1984
  - 4) Letter, 602-84-086, G. C. Sorensen (SS) to A. Schwencer (NRC), "Operating Experience Survey", dated February 24, 1984

The WNP-2 Operating License NPF-21, Condition (15), BWR Startup or Operating Experience states:

During the startup test program, the licensee shall have on each shift a licensed individual with previous startup or operating experience on a comparable BWR, or an advisor who meets these experience requirements.



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In reference 1 the Commission accepted with clarifications, an Industry Working Group proposal (reference 2) defining acceptable levels of experience "required to ensure competence for safe startup and operation of a nuclear power plant". The Working Group proposal provided criteria for defining when a Shift Advisor is and is not necessary. Reference 3, Generic Letter 84-16, transmitted the Commission's position on this issue to us.

The Supply System has determined, based on the criteria presented in the Industry Working Group proposal, as clarified by the Commission, that an individual on shift designated "Shift Advisor" is no longer required for any of the six shifts at WNP-2 in order to satisfy License Condition (15). Our basis for this determination is that the Senior Reactor Operators, through participation in the power ascension test program, have the experience of "Shift Advisors". This change in staffing will affect only one of the six shifts at WNP-2. Licensed Operators employed by the Supply System on the other five shifts had sufficient experience so that "Shift Advisors" were not necessary.

This determination is based on the following section of the Industry Working Group proposal which sets forth criteria for determining when a Shift Advisor is no longer required:

"the utility should replace the advisor or advisors with its own personnel either before, during or after startup when one utility SRO's (sic) per shift gains 6 months of "Hot" participation experience. Participation experience means 'direct involvement in the review and discussions leading to operating decisions'. Because participation experience will provide utility operators direct involvement in operating decisions at the same type plant, the advisor's experience will no longer be required on shift."

Over 6 months have passed since WNP-2 commenced plant heatup. The WNP-2 Senior Reactor Operators involved in the power ascension test program have performed plant maneuvers more numerous and more complicated than those encountered over a six month span of standard "at-power" operation. The WNP-2 Senior Reactor Operators commenced the power ascension test program with a level of operating experience beyond that normally encountered on a near term operating plant (Reference 4). This initial experience coupled with the six months of experience gained over the power ascension test program more than satisfies the Industry Working Group criteria.




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Accordingly, Shift Advisors at WNP-2 will no longer be utilized and the Senior Reactor Operators on each shift that have participated in the power ascension test program to date are considered to be the "licensed individual with previous startup or operating experience on a comparable BWR". As such, the Supply System considers Licensing Condition (15) to the WNP-2 Operating License, NPF-21, to be satisfied without the need for an advisor.

Should you have any questions, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

  
G. C. Sorensen, Manager  
Regulatory Programs

PLP/tmh

cc: R Auluck - NRC  
WS Chin - BPA  
JB Martin - NRC RV  
AD Toth - NRC Site

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