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 FACIL: 50-317 Calvert Cliffs Nuclear Power Plant, Unit 1, Baltimore 05000317
 50-318 Calvert Cliffs Nuclear Power Plant, Unit 2, Baltimore 05000318

AUTH. NAME: LUNDVALL, A.E. AUTHOR AFFILIATION: Baltimore Gas & Electric Co.
 RECIP. NAME: CLARK, R.A. RECIPIENT AFFILIATION: Operating Reactors Branch 3

SUBJECT: Requests that NRC reconsider position re shift technical
 advisor training program requirements, per NUREG-0737, Item
 I.A.1.1 & delay final decision until issuance of rule.
 Interim requirement not in best interest of "new hires".

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1. A.1.1 is a delay final decision until issuance of rule.
Interim recruitment not in best interest of "new hires".

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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

January 4, 1983

U.S. Nuclear Regulatory Commission
Division of Licensing
Washington, DC 20555

ATTENTION: Mr. Robert A. Clark, Chief
Operating Reactors Branch #3

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Shift Technical Advisor (STA)

REFERENCE: (a) Letter dated July 9, 1982, to A. E. Lundvall, Jr., from R. A. Clark
on NUREG-0737, Item I.A.1.1 Shift Technical Advisor

Gentlemen:

In reference (a) you found that our STA training program met the intent of your previous correspondence on the same subject. However, you also indicated that "new hires" to the STA program are expected to have a bachelor's degree or equivalent in a scientific or engineering discipline.

As you are aware, the STA training program was given to all Shift Supervisors and Senior Control Room Operators (SCROs) who were incumbent in their positions at the time the program was conducted. The SCROs who successfully completed the program were then utilized on shift as STAs, in addition to the SCRO normally required for shift staffing. After the start of the original STA training, four additional individuals were promoted to SCRO and were incumbent in that position at the time of your July 9, 1982, letter was issued. It had been planned to conduct STA training for these persons beginning in early 1983. Since these four SCROs are not "new hires" to the program, unless otherwise notified by your staff, we intend to continue with their training and to include them in the shift rotation as STAs after successful completion of the course.

To further address the question of degreed "new hires", we are aware of the efforts of the staff in drafting the "Integrated Plan for the Development of a Rule for Shift Crew Qualifications" which proposes a final rule in FY-84. To shift our training resources at this time to support the training of degreed individuals as STAs would have a major impact on our ability to provide initial and requalification training for Operator Licensed (OL) and Senior Operator Licensed (SOL) individuals. It is our goal to train and license enough OL and SOL personnel to support a six-shift rotation by the end of 1983. To do so, we are conducting concurrent classes for OL candidates, staggered by approximately six months. Included in these plans, is licensing enough individuals to staff the full scale simulator scheduled for operation in early 1984. This schedule was developed two years

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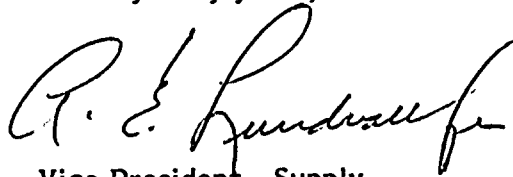
Mr. Robert A. Clark
January 4, 1983
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ago and has been a major priority of the Baltimore Gas & Electric Company. To interrupt this schedule by interposing a requirement for additional, intensive training for degreed STA candidates would delay the attainment of the six-shift goal and could impact our ability to test and place into operation our full scale simulator on time.

Since the staff has found our present STA program to be acceptable in meeting currently published guidelines, and the study of a proposed rule which will make a final determination regarding the need for degreed individuals on-shift is in progress, we do not feel that the imposition of an interim requirement for degreed "new hires" to the STA program is in the best interests of safe plant operation. In our opinion, the dedication of our training resources to the six-shift goal and support of the simulator will be of much greater long-term value than the implementation of the interim measures set forth by your letter. We, therefore, request that you reconsider your position and delay any final decision in this area until the issuance of a rule on this matter.

Should you require further information regarding these matters, we would be pleased to meet with you at your convenience.

Very truly yours,

A handwritten signature in cursive script, appearing to read "R. E. Lundvall".

Vice President - Supply

AEL/RED/gla

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC

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