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 RECIP. NAME: DENTON, H.R. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards responses to Licensee Qualification Branch
 Questions 630.1 - 630.8 re personnel training program, per
 draft SER Open Items 316-323. Training for all License
 candidates completed prior to cold license exam.

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Carolina Power & Light Company

JUL 25 1983

SERIAL: LAP-83-229

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, DC 20555

SHEARON HARRIS NUCLEAR POWER PLANT
UNIT NOS. 1 AND 2
DOCKET NOS. 50-400 AND 50-401
DRAFT SAFETY EVALUATION REPORT RESPONSE
LICENSEE QUALIFICATION BRANCH

Dear Mr. Denton:

Carolina Power & Light Company (CP&L) hereby transmits responses to Licensee Qualification Branch Questions 630.1 through 630.8, forwarded by NRC letter dated April 11, 1983, on the Shearon Harris Nuclear Power Plant (SHNPP) training program. These questions have been designated SHNPP Draft Safety Evaluation Report (DSER) Open Items 316 through 323. If additional information is needed, please contact our staff.

Yours very truly,

M. A. McDuffie
Senior Vice President
Engineering & Construction

JHE/kjr (7052JHE)
Attachment

cc: Mr. N. Prasad Kadambi (NRC)
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RESPONSES TO
REQUEST FOR ADDITIONAL INFORMATION
FOR SHEARON HARRIS NUCLEAR POWER PLANT
PERSONNEL TRAINING

Question 630.1

Discuss the program which will provide the training to Reactor Operators and Senior Reactor Operators in the following areas:

- a. Recognition of emergency conditions.
 - b. Classification of observed emergency conditions in accordance with the Emergency Classification System.
 - c. Notification of emergency to off-site authorities.
 - d. Recommendation of protective actions to off-site authorities.
 - e. Direction of station staff to take protective actions.
- (Ref. NUREG-0800, Sections 13.2.1.I.B.1 and 13.2.1.II.1.B)

Response:

- a. Recognition of Emergency Conditions will be covered in classroom training in the Pre-Simulator portion of the Cold License Program for Reactor Operator - Senior Reactor Operators. It is currently under development by Westinghouse and will be approximately two weeks long in the session entitled "Accident Analysis". It will cover all the major accidents to the plant. Recognition of Emergency Conditions will also be covered in the nine-week Simulator Training for Cold License Candidates.
- b. Classification of Observed Emergency Conditions in accordance with the Emergency Classification System will also be covered in the Pre-Simulator classroom training and will be reinforced in the nine-week Simulator Program. Each operator as part of the diagnostic and response process to emergencies on the simulator will be required to classify each emergency condition properly.
- c,d,&e. Notification of emergencies by site authorities. During the Simulator Training, each time an emergency is entered and classified by the shift, they will be required to simulate the initial notification of the emergency to off site authorities. This will be done on the simulator utilizing the Emergency Plans and Procedures, and the communications available on the simulator.

The CP&L Emergency Plan Training Program is described in the Corporate Emergency Plan Implementation Procedure CEPIP-19, which is referenced by the SHNPP Emergency Plan, Section 5.2.1. The program provides initial emergency response training and periodic retraining for plant personnel. Objectives of this program, applicable to the training of plant operators, shift foremen and shift technical advisors, include:

1. Develop the necessary understanding of Emergency Action Levels (EAL) and proficiency in recognizing and classifying emergency conditions.
2. Develop capability for effectively alerting, notifying, and reporting to the federal, state, local, corporate, and plant personnel.
3. Develop capability for effective estimation and assessment of radiological releases and the radiological consequences of accidents or accidental releases.
4. Develop understanding of Radiological Emergency Protective Action Guides (PAGs) and protective actions for people and other resources both on-site and off-site.

These objectives are met through the use of the lesson plan, study guide and quiz developed for the plant operator/shift foremen/shift technical advisor group. The lesson plan and study guide are used to train this group in the following emergency response procedures in addition to the Emergency Plan:

- Initial Emergency Actions
- Site Emergency Coordinator
- Follow-up Notification & Communications
- Communications Activities
- Use of Communications Equipment
- Mobilization of Outside Agencies
- Initial Dose Projection

These procedures are referenced in Appendix F of the SHNPP Emergency Plan and implement specific portions of the Plan.

Question 630.2

Discuss the certifications completed pursuant to Sections 55.10(a)(6), 55.33(a)(4) and (5) of 10 CFR Part 55. Provide the title of the individual who will certify the eligibility of individuals for licensing or renewal of license.
(Ref. Enclosure 1 of H. R. Denton's March 28, 1980 letter, Section A.3)

Response:

Certifications will be completed pursuant to 10 CFR 55.10(a)(6), 55.33(a)(4) and (5). Each application for a license shall contain evidence that the applicant has learned to operate the controls in a competent and safe manner and has need for an operator or a senior operator license in the performance of his duties. Each application for renewal will contain a statement that during the effective term of his current license the applicant has satisfactorily completed the requalification program for the facility for which operator or senior operator license renewal is sought. Each application for renewal will also contain evidence that the licensee has discharged his license responsibilities competently and safely.

The Vice President - Nuclear Operations will certify the eligibility of individuals for licensing or renewal of license.

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Question 630.3

Provide the title of the individual who is responsible for:

- a. The overall conduct and administration of the plant training programs for licensed operators and non-licensed plant staff.
- b. Development, implementation and administration of licensed and non-licensed operator training.

(Ref. NUREG-0800, Section 13.1.1.II.B)

Response:

The Plant General Manager is directly responsible for the overall conduct and administration of the plant training programs for Licensed Operators and Non-Licensed staff. The Harris Training Unit Supervisor is responsible for the development, implementation and administration of Licensed and Non-Licensed Operator Training.

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DEPARTMENT OF THE HISTORY OF ARTS

THE UNIVERSITY OF CHICAGO

Question 630.4

Provide commitment to comply with the following TMI related requirement as specified in Item I.A.2.1 of NUREG-0737:

The requirement for three months on-shift experience for control room operators and SRO candidates as an extra person on shift is not required for cold license candidates and, hence, is not applicable to SHNPP. However, we will require SHNPP to comply with this requirement for hot license candidates after three months of station operation.

Response:

The Shearon Harris Nuclear Power Plant will comply with the requirement of three months on-shift experience for Control Room Operators and SRO candidates commencing three months after station operation.

Question 630.5

Provide the qualification of the instructors in the training program and the requalification program administered to the instructors in order to have them remain certified as instructors, as specified in Enclosure 1 of H. R. Denton's March 28, 1980 letter to all power reactor applicants and licensees, and in Item I.A.2.3 of NUREG-0737.

Response:

Instructors who teach Systems, Integrated Responses, Transient and Simulator courses will certify SRO on the Shearon Harris Simulator and be enrolled in the Simulator Re-qualification Program described in the attached Enclosure 1. After Cold License Examination, Harris Unit Instructors will be enrolled in the Shearon Harris Licensed-Operator Re-qualification Program.

Question 630.6

Provide a training program for mitigating core damage as described in II.B.4 of NUREG-0737 in accordance with the guidance as specified in Enclosure 3 of H. R. Denton's letter dated March 28, 1980. Provide a listing of those individuals and their qualifications who must participate in the training program and provide a schedule for that training as related to the presently scheduled fuel load date.

Response:

The Mitigating Core Damage training program will be taught as part of the Pre-Simulator classroom training. It will include the following major topics: Core Cooling Mechanics - Potentially damaging situations (small break LOCA without high head injection, loss of feedwater, loss of various methods of cooling the plant); Vital Process Instrumentation which includes RTD's, thermocouples, and transducers used for measuring pressure, level, and flow in the Primary System; Recognizing Core Damage through the Incore and Excore Instrumentation; Excore Instrumentation response to various accident conditions; Primary Chemistry; Post-Accident Radio-Chemistry; Radiological Aspects of Core Damage; and Gas Generation. The lesson plans are being developed currently by Westinghouse Corporation and will meet the requirements of Item II.B.4 of NUREG 0737 and enclosure three of H. R. Denton's letter dated March 28, 1980.

Shift Technical Advisors (STA's) and operating personnel from the Plant General Manager through the operations chain including licensed operators will complete the entire course. These individuals will receive annual retraining on all topics.

Managers and technicians in the Instrumentation and Control (I&C), Health Physics (HP), and Chemistry Departments will receive training commensurate with their responsibilities. These individuals will receive annual retraining respective to their areas of responsibility.

The training will be completed for all License candidates prior to Cold License Examination. Training for Non-Licensed personnel and Management personnel will be completed prior to fuel load.

Question 630.7

Provide a detailed description of the training program for the Shift Technical Advisor in accordance with the guidance as specified in NUREG-0737, Appendix C.

Response:

Shift Technical Advisor (STA) training will be in accordance with the program described in Enclosure 2.

1. $\frac{1}{2}$ 2. $\frac{1}{2}$ 3. $\frac{1}{2}$ 4. $\frac{1}{2}$ 5. $\frac{1}{2}$ 6. $\frac{1}{2}$ 7. $\frac{1}{2}$ 8. $\frac{1}{2}$ 9. $\frac{1}{2}$ 10. $\frac{1}{2}$

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Condition	10 years (open circles)	12 years (filled circles)	14 years (open squares)
1	65	75	80
2	70	80	85
3	75	85	90
4	80	80	85
5	85	70	75

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Question 630.8

With regard to the fire brigade training program, provide detailed discussion for each of the items as specified in the Standard Review Plan (NUREG-0800), Sections 13.2.2.II.6.A.

Response:

Items as specified in the Standard Review Plan (NUREG-0800), Sections 13.2.2.II.6.A:

6.A.1.a - Initial instruction will consist of classroom and training ground training and will include:

1. Indoctrination of the plant fire-fighting plan with specific identification of each individual's responsibilities, as appropriate.
2. Identification of the type and location of special fire hazards and associated types of fires that could occur in the plant. Information will be provided on general fire hazards and classes of fires.
3. The toxic and corrosive characteristics of expected products of combustion.
4. Identification of the location of fire-fighting equipment for each fire area and familiarization with the layout of the plant, including access and egress routes to each area, if deemed necessary.
5. The proper use of available fire-fighting equipment and the correct method of fighting each type of fire. The types of fires covered will include fires in energized electrical equipment, fires in cables and cable trays, hydrogen fires, fires involving flammable and combustible liquids or hazardous process chemicals, fires resulting from construction or modifications (welding), and record file fires.
6. The proper use of communication, lighting, ventilation, and emergency breathing equipment.
7. The proper method for fighting fires inside buildings and confined spaces.

In 5, 6, and 7 above, the instruction will include classroom instruction and hands-on training. Electrical fires will not be energized, but will be simulated. Hydrogen fires will be simulated.

8. The direction and coordination of the fire fighting activities (fire brigade leaders only).

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9. Detailed review of selected fire-fighting strategies and procedures. Time will not permit a detailed review of all plans.
10. Review of the latest plant modifications and corresponding changes in fire-fighting plans. Fire protection systems, and plans will be covered in the initial course and changes will be covered in quarterly training sessions.

6.A.i.b - The instruction shall be provided by qualified individuals who are knowledgeable, experienced, and suitably trained in fighting the types of fires that could occur in the plant and in using the types of equipment available in the nuclear power plant. Instructors will be approved by the Senior Specialist-Fire Protection and will be knowledgeable and experienced in the subject they are to teach.

6.A.i.c - Instruction shall be provided to all fire brigade members and fire brigade leaders. Prior to assignment to the fire brigade, each member and leader will receive initial training.

6.A.i.d - Regular planned meetings shall be held at least every 3 months for all brigade members to review changes in the fire protection program and other subjects as necessary. A training session will be conducted once each calendar quarter to review changes in the fire protection program and to expand upon the initial classroom training (see 6.A.i.e.).

6.A.i.e - Periodic refresher training sessions shall be held to repeat the classroom instruction program for all brigade members over a two-year period. These sessions may be concurrent with the regular planned meetings. It is not intended to just repeat the classroom instruction program over a two-year period. The original subject will be presented in a manner to expand the member's knowledge.

6.A.ii - Practice

Practice sessions shall be held for each shift fire brigade on the proper method of fighting the various types of fires that could occur in a nuclear power plant. These sessions shall provide brigade members with experience in actual fire extinguishment and the use of emergency breathing apparatus under strenuous conditions encountered in fire-fighting. These practice sessions shall be provided at least once per year for each fire brigade member. Practice will be provided in the initial training in fighting various types of realistic fires. This will include the use of Self Contained Breathing Apparatus (SCBA) in interior structural fires simulating cable tray, confined spaces, Class B fires and others as needed. This practice will be provided yearly for each member. At these annual sessions, brigade leaders will be provided an opportunity to develop leadership skills.

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6.A.iii - Drills

6.A.iii.a - Fire brigade drills shall be performed in the plant so that the fire brigade can practice as a team. Drills will be conducted in the plant areas where the brigade will be expected to respond.

6.A.iii.b - Drills shall be performed at regular intervals not to exceed 3 months for each shift fire brigade. Each fire brigade member should participate in each drill, but must participate in at least two drills per year.

A sufficient number of these drills, but not less than one for each shift fire brigade per year, shall be unannounced to determine the fire fighting readiness of the plant fire brigade, brigade leader, and fire protection systems and equipment. Persons planning and authorizing an unannounced drill shall ensure that the responding shift fire brigade members are not aware that a drill is being planned until it is begun. Unannounced drills shall not be scheduled closer than four weeks.

At least one drill per year shall be performed on a "back shift" for each shift fire brigade.

Drills will be conducted on a calendar quarter basis. Each shift brigade will receive one drill per quarter with one of these each year being unannounced and one being performed on a "back shift". If an unannounced drill is conducted on a backshift, it will fulfill all these requirements in that quarter. Actual fires and/or false alarms will not be used to satisfy all three requirements.

6.A.iii.c - The drills shall be pre-planned to establish the training objectives of the drill and shall be critiqued to determine how well the training objectives have been met.

Unannounced drills shall be planned and critiqued by members of the management staff responsible for plant safety and fire protection. Performance deficiencies of a fire brigade or of individual fire brigade members shall be remedied by scheduling additional training for the brigade or members. Unsatisfactory drill performance shall be followed by a repeat drill within 30 days.

Pre-planned drills will be conducted and critiqued to ensure that the brigade performs satisfactorily. Unsatisfactory performance will be remedied by training and/or additional drills within 30 days. Drills will be conducted by competent members of the management staff. False alarms and/or actual fires may be documented as a training evaluation if sufficiently critiqued to ensure that adequate training was accomplished. The Senior Specialist-Fire Protection will make the determination of training accomplished using (e) below as a guide.

6.A.iii.d - At 3-year intervals, a randomly selected unannounced drill shall be critiqued by qualified individuals independent of the licensee's staff. A copy of the written report from such individuals shall be available for NRC review.

A tri-annual unannounced drill will be critiqued by qualified independent persons. This may be done concurrently with the Tri-Annual Audit by an outside consultant.

6.A.iii.e - Drills shall, as a minimum, include the following:

1. Assessment of fire alarm effectiveness, time required to notify and assemble the fire brigade, and selection, placement and use of equipment and fire fighting strategies.
2. Assessment of each brigade member's knowledge of his or her role in the fire fighting strategy for the area assumed to contain the fire. Assessment of the brigade member's conformance with established plant fire-fighting procedures and use of fire fighting equipment, including self-contained emergency breathing apparatus, communication equipment, and ventilation equipment to the extent practicable.
3. The simulated use of fire-fighting equipment required to cope with the situation and type of fire selected for the drill. The area and type of fire chosen for the drill should differ from those used in the previous drill so that brigade members are trained in fighting fires in various plant areas. The situation selected should simulate the size and arrangement of a fire that could reasonably occur in the area selected, allowing for fire development due to the time required to respond, to obtain equipment, and organize for the fire, assuming the loss of automatic suppression capability.
4. Assessment of the brigade leader's direction of the fire-fighting effort as to thoroughness, accuracy, and effectiveness. Drills will include the above except that in some drills we will simulate automatic suppression systems operation. (In some cases this condition may be more difficult to handle).

6.A.iv - Records

Individual records of training provided to each fire brigade member, including drill critiques, shall be maintained for at least 3 years to ensure that each member receives training in all parts of the training program. These records of training shall be available for NRC review. Retraining or broadened training for fire-fighting within buildings shall be scheduled for all those brigade members whose performance records show deficiencies.



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Each individual's training record will show the dates and a class or drill number. The drill critique and class content will be filed separately and can be reviewed by comparing these dates and members. Remedial training will be conducted when so indicated by performance records.

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Enclosure 1

INSTRUCTOR SRO CERTIFICATION AND REQUALIFICATION PROGRAMS

The certification program will consist of twelve weeks of intensive training. Each instructor, that has not previously held an SRO license on a Westinghouse plant, will be removed from all duties for the duration of the course. The requalification program is a continuing program which will be repeated annually. Each instructor will attend scheduled seminars during the course of the year.

The certification course consists of the following topics:

| <u>Subject</u> | <u>Duration</u> |
|--|-----------------|
| 1. Harris Systems | 3 weeks |
| 2. Theory | 2 weeks |
| 3. Administrative Procedures | 1 week |
| 4. Emergency and Abnormal Procedures | 1 week |
| 5. Radiation Protection and Chemistry | 1 week |
| 6. Simulator | |
| A. Normal Evolutions | 1 week |
| B. Transients & Multiple Casualties | 3 weeks |
| 7. During the final week of the program, simulated SRO exams will be administered. | |

The certification program for all SHNPP Licensing Instructors will be completed by August 31, 1983.

SIMULATOR INSTRUCTOR REQUALIFICATION PROGRAM

Purpose:

To establish the requalification program requirements for simulator instructors assigned to the Harris Energy & Environmental Center. The program is designed to exceed the requirements of 10 CFR 55 Appendix A in the areas that are relevant to simulator instructors.

Definition:

For the purpose of this document, an instructor is defined as any individual who teaches system response, integrated response, transient and simulator courses.

Procedure:

I. A. Annually, each instructor will be required to pass a comprehensive exam covering material applicable to the Shearon Harris Nuclear Plant simulator. This exam will include the following sections:

1. Theory
 - a. Reactor theory
 - b. Heat transfer, fluid flow and thermodynamics
2. Operating characteristics
3. Instrumentation
 - a. Control systems
 - b. Protection systems
4. Safety and emergency systems
5. Normal and emergency procedures
6. Administrative procedures
 - a. Harris standard tech specs
 - b. Administrative instructions

B. Annual Exam Criteria

1. Overall grade \geq 80%
 - a. Each subject grade \geq 70% - no action
 - b. Any subject grade $<$ 70%
 - (1) Upgrade that subject within one month
 - (2) Reexamination in that subject results in a grade of \geq 80%

2. Overall grade < 80%
 - a. Removed from simulator instructor duties
 - b. Upgrade within one month
 - c. Pass a comprehensive examination with an overall grade $\geq 80\%$ and each subject grade $\geq 70\%$
 3. An individual who fails to meet the above criteria (1.a, 1.b.2 or 2.c) will be removed from simulator instructor duties and be reassigned to duties that do not require an SRO level of knowledge.
- C. The individual who administers and grades the annual comprehensive exam is not required to take the examination.
- II. A. Each instructor will participate in simulator training programs for a minimum of 40 hours per year. This participation will be as the instructor in the control room. If this requirement cannot be met, the individual will be evaluated on the simulator by completing an individual operating exam.
- B. Evaluation Method
1. Each instructor will be evaluated annually, to determine his ability to perform instructor duties on the simulator. The evaluation will be performed by a member of management at least one level above the instructor. The evaluation will include the following areas:
 - a. Technical competence
 - b. Ability to communicate orally
 - c. Ability to follow the specified program
 2. The evaluation may be performed using either method described below
 - a. Observation of the instructor during a simulator training exercise.
 - b. Individual oral exam

III. Continuing Training

A. Lecture Series

Preplanned lectures will be conducted at least twice monthly. Each lecture will be approximately two hours in duration. The following subjects will be covered at the indicated frequency as a minimum.

| <u>Subject</u> | <u>Frequency</u> |
|------------------------------------|------------------|
| 1. Theory | twice annually |
| 2. Heat transfer & fluid flow | twice annually |
| 3. Operating characteristics | twice annually |
| 4. Safety and emergency systems | twice annually |
| 5. Normal and emergency procedures | twice annually |
| 6. Administrative procedures | twice annually |
| 7. Robinson - Harris differences | annually |
| 8. Significant operating events | as appropriate |
| 9. Simulator changes | as appropriate |
| 10. Other relevant subjects | as appropriate |

B. Self Study

1. Each instructor will read/review NRC Transmittals as they are received from CP&L's Nuclear Licensing Unit, as well as selected Licensee Event Reports (which are reviewed by the training unit monthly for inclusion in future programs).
2. Each instructor will be required to read any documents concerning problems or changes that impact simulator operation or training.

Enclosure 2

11. 2. 2.

SHNPP STA TRAINING PROGRAM
FOLLOWING INITIAL FUEL LOAD

1. Education: BS Engineering or Science
2. Experience: 12 months nuclear power plant
3. Training
 - a. Reactor Theory 100 hrs. (approx.)
 - b. Thermal Sciences 128 hrs. (approx.)
 - c. Electrical Sciences 60 hrs. (approx.)
 - d. Radiation Protection 36 hrs. (approx.)
 - e. Reactor Chemistry and Nuc. Materials 40 hrs. (approx.)
 - f. Management and Supervisory 40 hrs. (approx.)
 - g. Transient and Accident Analysis 120 hrs.
Mitigating Core Damage
 - h. Procedures
 1. General Operating Procedures 120 hrs. (approx.)
 2. Technical Specifications
 3. Administrative Control
 4. Plant Emergency Plan
 5. Emergency Operation
 6. Industrial Events.
 - i. Systems 200 hrs. (approx.)
 - j. Simulator 120 hrs.
 - k. OJT 480 hrs.

1444 hrs. (approx.)
4. Retraining - STA's will participate in the SRO retraining program.

INPO Comparison with SHNPP Training Program

1. Section Criteria

SHNPP

- a. BS Degree in Engineering or Physical Sciences.
- b. 12 months or greater nuclear experience.
- c. Complete security check and other preapplicant screening required for all employees.

INPO

- a. Degree required is more specific than educational requirement by INPO.
- b. The experience requirement agrees with INPO (1 year).

2. Qualifications

SHNPP

Prior to assignment to STA duties, each candidate must successfully complete the STA Training Program after meeting the selection criteria. Program may be modified based on previous experience and training.

INPO

SHNPP STA Training Program and selection criteria covers the General Qualifications of INPO Sections 5 and 6.

3. Training Program

a. Prerequisites beyond high school diploma (INPO 6.1.1)

SHNPP

Due to selection criteria stated in Item 1 above, Math, Chemistry, and Physics will not be covered during STA Training. The candidates' transcripts will be checked and verified as to the validity of a Bachelor of Science Degree in Engineering or related Physical Science.

INPO

This position agrees with INPO recommendations stated in Section 6.1.1.

b. College level fundamentals (INPO Item 6.1.2)

SHNPP

A minimum of 440 classroom hours will be presented to STA candidates covering the following subjects:

| | |
|---------------------|-------------------------------------|
| Reactor Theory | Nuclear Materials |
| Thermal Sciences | Radiation Protection/Health Physics |
| Electrical Sciences | Mitigating Core Damage |
| Reactor Chemistry | |

NOTE: Nuclear Instrumentation is covered in Systems Training and Radiation Protection.

INPO

INPO recommends 520 hours contact time and specific hours for each subject in Section 6.1.2. Because of the selection criteria, the Math portion (90 hours) is not deemed necessary and on this bases SHNPP exceeds INPO recommendations.

c. Applied fundamentals (INPO Item 6.2)

SHNPP

This course, taught in Section 3b above, will include plant specific application. Therefore, no additional time is required.

INPO

Complies with Section 6.2 of INPO.

1. Each Shift Technical Advisor holds a BS Degree in Engineering or related Science.
2. Each STA has completed a plant-specific course covering the following materials taught at the SRO level:
 - a. Academics (17 weeks)
 - b. On-the-Job Training (12 weeks)
 - c. Transient and Accident Analysis, Mitigating Core Damage (3 weeks)
 - d. Management/Supervisory Training (1 week)
 - e. Simulator Training (3 weeks)

3. Annual Retraining

STA will follow the senior operator retraining schedule.
Exceeds INPO requirements.

d. Management Skills (INPO Item 6.3)

SHNPP

STA Course will include a minimum of one week of Management Training.

INPO

Complies with INPO.

e. Systems Training (INPO Item 6.4)

SHNPP

Each candidate will receive a minimum of 200 contact hours training on specific plant systems.

INPO

This meets time recommended in Item 6.4.

f. Administrative Controls (INPO Item 6.5)

SHNPP

Each candidate will receive approximately 80 hours covering administrative procedures and controls as part of STA Training. This time is in addition to General Employee Training, Plant Orientation Training and Structured OJT.

INPO

SHNPP exceeds INPO Guidelines of 80 hours.

g. General Operating Procedures (INPO Item 6.6)

SHNPP

Each candidate will receive approximately 40 hours covering General Operating Procedures. This will be reinforced during OJT.

INPO

SHNPP exceeds INPO Guidelines of 30 hours.

h. Transient and Accident Analysis (INPO Item 6.7)

SHNPP

Each candidate will receive a minimum of 40 hours training in T&AA and Emergency Procedures which will be reinforced during Simulator Training.

INPO

Recommends 30-45 hours, SHNPP meets this requirement.

i. Simulator Training

SHNPP

Each candidate will receive 120 hours Simulator Training.

INPO

Recommend 100 hours, SHNPP exceeds this.

SHNPP will have an OJT program consisting of 480 hours of observation and checkouts.

