



**Florida
Power**
CORPORATION

August 3, 1981
#3-081-04
File: 3-0-3-a-8

Mr. D. G. Eisenhut
Director, Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
NRC Generic Letter 81-01, Dated May 4, 1981
Qualification of Inspection Examination, and
Testing and Audit Personnel

Dear Mr. Eisenhut:

Your letter of May 4, 1981, requested Florida Power Corporation to provide commitments and implementation schedule to meet regulatory positions C.5, 6, 7, 8 and 10 of Regulatory Guide 1.58, Revision 1 and Regulatory Guide 1.146 or alternative methods of complying with 10 CFR 50, Appendix B, regarding qualification of nuclear power plant inspection, examination, and testing and audit personnel.

Florida Power Corporation has a current alternative program which complies with the intent of Regulatory Positions C.5, 6, 7, 8 and 10 of Regulatory Guide 1.58, Revision 1, and Regulatory Guide 1.146. This alternative program is described in detail in the attachment.

Should you require any additional information, please contact this office.

Very truly yours,

William A. Cross

W. A. Cross
Manager
Nuclear Licensing

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ATTACHMENT

FPC RESPONSE TO REGULATORY POSITIONS C.5, 6, 7, 8, and 10 of R.G. 1.58, Rev. 1 and R.G. 1.146

FPC RESPONSE TO REGULATORY GUIDE 1.58, REVISION 1.

Florida Power Corporation limits the formal classification of Level I, Level II, and Level III identified in ANSI N45.2.6-1978 to those quality control, quality programs and engineering personnel certified to perform specific non-destructive examinations and 10 CFR 50 Appendix J leak rate tests. All other forms of inspection, examination, and testing of safety related equipment are implemented by approved written procedures which individually address personnel qualification requirements by position title in lieu of Level I, Level II and Level III. Job descriptions and/or minimum qualifications are documented for each management and bargaining unit position within the nuclear organization. In each case, the qualifications applicable to these job classifications meet or exceed the education and experience recommendations of ANSI N45.2.6-1978.

REGULATORY POSITION C.5

Except for NDE and 10 CFR 50 Appendix J testing mentioned above, responsibilities corresponding to ANSI 45.2.6-1978 Level III activities are assigned to Section Head and Department Superintendent/Manager positions. The education experience and capability requirements for these positions exceed those of ANSI N45.2.6-1978. All procedures established for the NDE methods per SNT-TC-1A-1975 and visual examinations methods are reviewed and approved by a Level III examiner certified in accordance with SNT-TC-1A-1975. In addition, all other procedures established for inspection, examination, and testing of safety related systems receive prior review by the Plant Review Committee which is comprised of at least five (5) department or section heads (or their alternates), to ensure a multidisciplinary overview. Several of these managers hold NRC operators licenses and, therefore, meet the educational and experience requirements of 10 CFR 55 including the physical and requalification training criteria.

REGULATORY POSITION C.6

The education and experience requirements specified for management and bargaining unit positions engaged in equivalent Level I, II, III activities exceed the recommendations of ANSI N45.2.6-1978 and, as a minimum, include requirements for a high school diploma or GED equivalent. In cases where personnel involved in testing or inspections do not meet this requirement, appropriate use of qualified personnel to supervise or oversee these activities will be employed. Additionally, the use of QA/QC inspectors to oversee certain safety-related activities enhances FPC's capability to meet this commitment as an acceptable alternative.

REGULATORY POSITION C.7

Procedures for inspection, examination and testing will specify the personnel qualification requirements. It is our intent in specifying these qualifications, for each procedure, that qualified individuals only will participate in the activity except for training purposes, in which case, qualified personnel will oversee the evolution. In addition, as a second level review of activities in progress, safety related procedures are reviewed prior to implementation for "hold points" or continuous involvement of Quality Control inspectors who meet the experience, education, and capability recommendations of ANSI N45.2.6-1978.

FPC will review the qualifications of personnel involved in inspections and testing that do not meet ANSI N45.2.6-1978 Level I requirements. An assessment of "sufficient" training to ensure an acceptable level of competence will be performed by January 1, 1982 and training will be conducted by January 1, 1983.

REGULATORY POSITION C.8

Florida Power Corporation complies with this regulatory position and has established a training program for all plant personnel consistent with the ALARA concept of Regulatory Guide 8.8. ALARA instructions to all inspection, examination and testing personnel will be provided by July 1, 1982.

REGULATORY POSITION C.10

It is Florida Power Corporation's policy to specify education and experience criteria which meet or exceed the requirements of the standard, and Regulatory Guide 1.58 Position C.6 in the position descriptions for personnel involved in inspection, examination, and testing of safety related systems. The determination of initial capability is thereby made and documented at the time of placement of personnel in an applicable position. Routine evaluations of personnel performing in applicable positions are made on at least an annual basis. However, if FPC identifies personnel in positions responsible for tests and inspections that do not meet the qualification requirements of ANSI N45.2.6-1978, appropriate documentation will be developed to provide the desired objective evidence of qualification.

RESPONSE TO REGULATORY GUIDE 1.146

FPC complies with the intent of Regulatory Guide 1.146 and full compliance will be achieved by January 1, 1982.