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William J. Cahill, Jr.  
Executive Vice President

March 13, 1991

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NO. 50-445 AND 50-446  
ESTABLISHING AN EXTENSION ALLOWANCE FOR GENERAL  
EMPLOYEE TRAINING AND RADIATION WORKER TRAINING

REF: TU Electric (TUGCO) Letter logged TXX-3327 from Billy R. Clements  
to Robert L. Tedesco, dated June 3, 1981.

Gentlemen:

In the referenced correspondence TU Electric stated that General Employee Training (GET) and Radiation Worker Training (RWT) "...will be repeated...on an annual basis." In the past, TU Electric has interpreted this commitment to mean that an individual's training expires if not repeated on or before the anniversary date for the last time he/she completed training. This interpretation of "annual" is placing an inordinate burden on personnel who work rotating shifts by causing these individuals to take GET or RWT or both about every nine months to maintain their "current" status. Therefore, TU Electric is modifying its commitment in this area to extend the annual period by up to 25% (characterized by either 365 days x 1.25 or 12 months x 1.25). This extension of training requirements parallels the allowable extension permitted for surveillance requirements per paragraph 4.0.2 of the CPSES Technical Specifications.

To further substantiate the acceptability of this extension, other plants have been polled and the following documents have been reviewed:

- o TU Electric correspondence.
- o CPSES Fire Protection Report.
- o CPSES Final Safety Analysis Report (FSAR).
- o CPSES Physical Security Plan (PSP).
- o 10CFR19 and 10CFR50.
- o INPO Guidance 87-004.
- o ANSI Standards ANS-18.7-1976 and ANS-3.1-1983.
- o Regulatory Guide 1.8.
- o NUMARC Guideline 89-01.
- o I&E Manual, procedure 41400.
- o Standard Review Plan (SRP) - NUREG-0800, Section 13.2.2.
- o Regulatory Guide 1.70

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404 North Olive Street L.B. 81 Dallas, Texas 75201

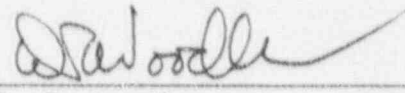
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Of these documents, only the referenced letter, the PSP, and the SRP refer to a periodicity for GET and RWT. The letter refers to annual, the PSP to 12 months and the SRP to two (2) years. The poll shows that TU Electric's modified commitment is consistent with current industry practices.

TU Electric intends to implement the 25% extension to the retraining period for General Employee Training and Radiation Worker Training as soon as related CPSES programs and procedures are revised. If there are any questions, please contact Mr. Roger Walker, Nuclear Licensing, at 214-812-6866.

Sincerely,

William J. Cahill, Jr.

By:   
D. R. Woodlan  
Docket Licensing Manager

GLB/gj

c - Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)  
Mr. J. W. Clifford, NRR