

Public Service Company of Colorado

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December 13, 1982
Fort St. Vrain
Unit #1
PPC-82-2728

Mr. E. P. Wilkinson, President
Institute of Nuclear Power Operations
1100 Circle 75 Parkway
Suite 1500
Atlanta, GA 30339

SUBJECT: Fort St. Vrain Unit No. 1
Operator Requalification

REFERENCE: NRC Generic Letter 82-18
October 12, 1982

Dear Mr. Wilkinson:

We have reviewed the above referenced letter and in our opinion this approach is contrary to INPO's objective of operator training, the capability of industry to police itself, and the long term proposed accreditation program.

The letter indicates that 20% of the licensed personnel will be subject to an NRC requalification exam each year with the objective of examining all licensed personnel within a five (5) year period.

The letter further indicates that the program should not represent a significant departure from the present requalification program. While we agree that we are required to conduct examinations any way, we do not agree with this approach in that it adds yet another level of regulatory action, and a level which, in our opinion is unwarranted.

Our requalification program is already carefully controlled by the NRC and is further audited by a multitude of outside agencies as well as internal audits. The NRC has complete access to our examinations and the results of these examinations, and has a free hand to monitor and audit any portion of the program they want. Our examinations are subject to internal formal review as well as NRC review, and it seems as though the program is almost constantly under some review or audit by organizations such as INPO, ANI, NRC Resident Inspectors, NRC Regional Inspectors, or our own Nuclear Facility Safety Committee or our QA Department. On top of all these activities we are now faced with yet another level of requalification examinations.

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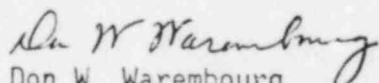
It appears to me that the only objective being accomplished by this program is to allow the NRC to proctor the examinations, as they already have the needed control in all other areas. If this is their primary objective why not use the site resident inspectors for this function rather than imposing another regulatory level.

This program tends to defeat the objectives of accreditation. If the NRC intends to monitor and hence judge the effectiveness of the training program by administering examinations, why be concerned with accreditation? Why not just use the NRC examination to measure the training programs effectiveness.

This subject was discussed at our last Nuclear Facility Safety Committee (NFSC) meeting, and it was the consensus of that Committee that the ever increasing regulatory requirements can have a significant impact on plant operations in terms of personnel turnover. It is also felt that older more experienced operators will be the most likely ones to experience this impact in terms of tolerance level year after year, and hence the operator cadre could suffer a significant loss of experience. Our NFSC indicated that they could not see any benefit from such a program and in the long term the program could possibly be a detriment.

We do not know if INPO had any role in either supporting or resisting the NRC position. It is requested that you review our position and the NRC position in time of INPO objective and advise us accordingly as to INPO's position on this matter.

Very truly yours,



Don W. Warembourg
Manager, Nuclear Production
Fort St. Vrain Nuclear
Generating Station

DWW/skr

cc: John T. Collins
Phil Wagner