



## LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION

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JOHN D. LEONARD, JR.  
VICE PRESIDENT - OFFICE OF CORPORATE SERVICES  
AND  
VICE PRESIDENT - OFFICE OF NUCLEAR

SNRC-1815

JUL 1 1991

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Supplement To  
LILCO's Request for a Limited-Scope Exemption from the Operators'  
Licenses Requirements of 10 CFR Part 55 and Request for Interim  
Relief Pending Disposition of Exemption  
Shoreham Nuclear Power Station - Unit 1  
Docket No. 50-322

- Ref: (1) LILCO letter SNRC-1719 dated June 5, 1990 to the U.S. Nuclear Regulatory Commission from W. E. Steiger, Jr.; subject: LILCO's Request for a Limited-Scope Exemption from the Operators' Licenses Requirements of 10 CFR Part 55 and Request for Interim Relief Pending Disposition of Exemption.
- (2) LILCO letter SNRC-1749 dated August 31, 1990 to the U.S. Nuclear Regulatory Commission from J. D. Leonard, Jr.; subject: Amendment to LILCO's Request for a Limited-Scope Exemption from the Operators' Licenses Requirements of 10 CFR Part 55 and Request for Interim Relief Pending Disposition of Exemption.
- (3) NRC Plant Tour and Training Facility (Simulator) Inspection June 6-7, 1991.

Gentlemen:

In reference 2 LILCO expanded its previous request (reference 1) and asked the NRC to (1) review and approve a change to LILCO's Licensed Operator Requalification Program, (2) exempt LILCO from the requirement to use a Simulation Facility, and (3) exempt LILCO from the regulatory requirements in 10 CFR Part 55 which apply only to programs and individuals licensed at operating reactors. During the NRC plant tour and simulator inspection (reference 3) LILCO was provided with comments and observations on our reference 2 submittal. This letter provides clarification and correction to LILCO's reference (2) request.

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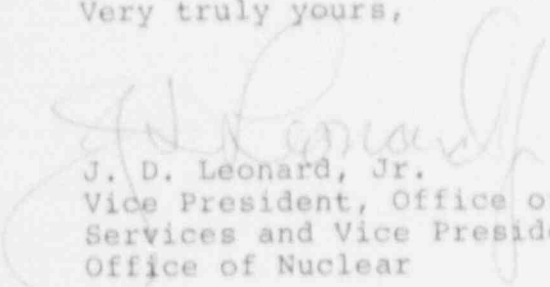
Attached to this letter are the related additional changes to Sections 8.3.1.1, 8.3.1.3, 8.4.4, and Appendix 12.1.2 of SP.12.014.07 entitled "Licensed Operator Regualification Program" which are submitted to provide clarification and correction to LILCO's reference (2) request. LILCO also wishes to clarify that it is requesting an exemption from 10 CFR 55.45(b) and 10 CFR 55.59 (c)(3) to the extent that they require (1) operating tests and regualification programs based upon an operating plant and (2) either a simulation facility which the Commission has approved for use, or a simulation facility consisting solely of a plant-referenced simulator which has been certified to the Commission by the facility licensee.

Description of Changes

- (1) Section 8.3.1.1 is clarified to be consistent with the Control Manipulations in Appendix 12.2,
- (2) Section 8.3.1.3 is clarified by removing an incorrect reference to an obsolete procedure, and
- (3) Section 8.4.4 is corrected to restore the frequency of written examinations to yearly.
- (4) The title of the 14th Emergency Procedure appearing in Appendix 12.1.2 is corrected to be consistent with the actual title of SP 29.023.02 "Secondary Containment Control-Emergency Procedure."

Should you have any questions or require clarification of the information provided in this letter please do not hesitate to call my office.

Very truly yours,

  
J. D. Leonard, Jr.  
Vice President, Office of Corporate  
Services and Vice President,  
Office of Nuclear

GJG/ab

cc: S. Brown  
T. T. Martin  
B. Norris

8.2.1.12 SNPS LERs (and significant or applicable industry LERs)

NOTE: Training on Emergency Operating procedures should include basis for the Emergency Operating procedures and the purpose and significance of key actions or steps in the emergency operating procedures and their effect on critical safety functions.

*(which apply in the deflected condition)*

- 8.2.2 Each license holder shall review the abnormal and emergency operating procedures on an annual basis.

Compliance with this requirement may be met by:

- 8.2.2.1 Actual performance under abnormal or emergency operating conditions.
  - 8.2.2.2 Walkthrough of the procedural steps necessary to cope with the situation.
  - 8.2.2.3 ~~Drills utilizing a training simulator or~~ on-site preplanned drill scenario.
  - 8.2.2.4 Preplanned lectures.
  - 8.2.2.5 Supervised self study. All self study will be under supervision of the training section and documentation will include examinations to verify effectiveness of the self study.
  - 8.2.2.6 Procedure review and/or rewrite as part of normal job function.
- 8.2.3 No more than 50% of the lecture series outlined in this section may be presented by videotape or film presentation. All lectures should be a balanced presentation of live instruction with related training aids.
- 8.2.4 Periodic lecture series exams shall be administered during the requalification year. (After approximately 24 hours of instruction time).

8.3 On The Job Training

- 8.3.1 Control Manipulations (Reference - Appendix 12.2)

- 8.3.1.1 *(which are consistent with the deflected condition of SNPS)* The control manipulations listed in Appendix 12.2 shall be performed in the plant ~~or SNPS simulator~~ at the indicated frequencies by each licensed operator and senior operator. Credit for participation in a plant ~~or simulator~~ drill shall only be given to actual participants, not to observers, controllers, or evaluators.

(Not Used)

8.3.1.2

Ten reactivity control manipulations from among those listed in Appendix 12.2.1 shall be performed annually by each licensed operator and senior operator. Reactivity control manipulations performed at SNPS or at the SNPS simulator can be used to fulfill this requirement.

8.3.1.3

The SNPS requalification training program will <sup>include plant</sup> ~~utilize~~ <sup>drills</sup> ~~the SNPS simulator~~ for retraining licensed operators. ~~Use of the simulator~~ should include the following:

The plant drills

.1 SNPS normal, abnormal, and emergency operating procedures as well as the appropriate SNPS alarm response procedures shall be used by SNPS operators. ~~during simulator requalification training.~~

.2 ~~Simulator requalification~~ <sup>drills</sup> training should be conducted using a crew concept; the students should be required to duplicate to the extent practical the functions and responsibilities of the normal SNPS control room staff.

(Not Used)  
.3 Each SNPS licensed RO and SRO shall undergo at least five days of simulator related training every six months. During these five days of simulator training, each student shall spend at least three days operating the simulator controls as part of the training crew.

.4 Plant ~~and simulator~~ drills should be conducted on a crew basis and should involve reviewing plant procedures steps, action identification, equipment control location, expected instrumentation response, plant communications and Technical Specification action identification.

Each drill should be planned in a drill scenario ~~as~~ <sup>indicated in Reference H-13</sup> and shall include the following:

- .1 Plant Condition
- .2 Expected Response
- .3 References
- .4 Objectives

8.3.2 Station Design, Procedure and Facility Changes.

8.3.2.1

All licensed personnel shall be kept cognizant of SNPS design, procedural and facility license changes using one or more of the following methods:

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- .1 Brief lectures conducted by section supervision or other appropriate personnel.
- .2 Staff meetings (also includes Review of Operations Committee meetings).
- .3 Written communications to each licensed individual.
- .4 Preplanned lecture series.
- .5 Required reading list.

8.3.2.2 Other on-the-job training such as cross job training and on-shift discussion may be used to increase the individuals proficiency.

#### 8.4 Evaluation

8.4.1 Licensed Operation Management personnel should review all phases of the requalification training program. This should include:

- .1 Periodic observation of <sup>plant drill</sup> ~~simulator training~~ sessions.
- .2 Conduct of plant walk thru exams.
- .3 Review of individuals training records.
- .4 Technical review of new training material.
- .5 Review and approval of overall training schedule.

8.4.2 The performance and competency of all licensed operators and senior operators shall be evaluated thru systematic observation by supervisors or training staff members. This shall include an evaluation of actions taken or to be taken during actual or simulated abnormal and emergency procedures.

Actual performance is evaluated on an annual basis, as a minimum, for all personnel with active licenses. These performance evaluations should be reviewed by the Operations Section and training needs identified. These needs should be used to identify topics to be presented in the requalification program. However, accelerated retraining for an individual license holder should also be identified.

8.4.3 Holders of inactive licenses shall be evaluated during <sup>plant drills</sup> ~~their~~ ~~reactivity manipulations~~ to identify training needs.

8.4.4 An annual written examination comparable in scope and degree of difficulty to an NRC examination. Consistent with the level of license held, shall be given to each <sup>CH</sup> ~~CH~~ license holder. (Appendix 12.4)

EMERGENCY PROCEDURES

1. Acts of Nature
2. Abnormal Radiation Release - Off-Gas (not used)
3. Abnormal Radiation Release - Liquid
4. Abnormal Radiation Release - Station Ventilation
5. Control Rod Drop (not used)
6. Emergency Use of S.B.R.G. (not used)
7. Loss of SRM and IRM Systems (not used)
8. Fuel Cladding Failure (not used)
9. Fuel Handling Accident
10. Emergency Shutdown (not used)
11. Hotwell Salt Water Intrusion (not used)
12. Loss of Condenser Vacuum (not used)
13. Loss of Primary Containment Integrity (not used)
14. ~~Loss of~~ Secondary Containment <sup>Control</sup> ~~Integrity~~
15. Loss of Offsite Power
16. Loss of all AC Power
17. Loss of Instrument Air
18. ~~Loss of Reactor Building Closed Loop Cooling Water~~ (not used)
19. Loss of Service Water
20. ~~Loss of Shutdown Cooling~~ (not used)
21. Loss of Turbine Building Closed Loop Cooling Water
22. Shutdown from Outside Control Room
23. ~~Level Control~~ (not used)