



VIRGINIA POLYTECHNIC INSTITUTE AND STATE UNIVERSITY

Blacksburg, Virginia 24061

NUCLEAR REACTOR LABORATORY

December 14, 1983

Dr. Cecil O. Thomas  
Chief, Standardization and Special Projects Branch  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Dr. Thomas:

We are writing you in regards to our Operator Requalification Program.

Our facility was shutdown in July, 1983, for a systems and console overhaul. It has become apparent that we can no longer meet a certain requirement of our Operator Requalification Program, specifically reactivity manipulations.

Our Operator Requalification Program, as delineated in Operating Procedure VI.8, (Attachment 1), requires a minimum of one complete evaluated start-up and shutdown during each 4 month period. This requirement will be overdue as of 1 January 1984. All other requirements set forth in OP VI.8 are being met as scheduled. It should be noted that, while we will become overdue with respect to meeting the four month evaluated Start-up and Shutdown requirements of our requalification procedure, all operators have met the requirement of 10 CFR 55 (Appendix A) requiring a minimum of ten reactivity manipulations over the course of the two year licensing period.

We are proposing to rectify our in-house deficiency in the following manner:

- 1) Use the hot-functional test program (no fuel in core) to familiarize the licensed operators with the console and systems changes. This will encompass at a minimum rod functional testing, primary and secondary temperature and flow testing, scram circuitry tests including simulating scram conditions and operator immediate and follow-up actions, individual instrument failures and loss of system power supplies. These tests will allow each operator a minimum of 16 hours console time prior to fuel loading.

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- 2) A complete review and evaluation of Normal and Emergency Procedures for each operator prior to fuel loading.
- 3) A complete review and evaluation of the approach to critical procedure for each operator prior to fuel loading.
- 4) Satisfactory completion of a comprehensive written examination, prior to fuel loading, for each operator. This examination will be written by a member of the Reactor Safety Committee who is knowledgeable of the facility and this examination will also function as the required annual examination (OP VI.8 Section E).
- 5) After fuel load and initial criticality, each operator will perform a minimum of 4 complete evaluated reactor start-ups and shutdowns at a power level not to exceed 10 kW. Reactor power will be limited to 10 kW or less until all operators have completed the minimum of 4 start-ups and shutdowns. This is derived from OP VI.8 Section F.
- 6) After the 4 start-ups and shutdowns at 10 kW or less and in accordance with OP VI.8, each operator will complete an evaluated start-up and shutdown to 100% power prior to being allowed unsupervised operation of the reactor.

We expect this will be a one-time arrangement as this systems overhaul will be completed as part of our license renewal. The reactor staff feels that the proposed process for re-establishing our operators' proficiency is sound and should actually allow for a more proficient operator than normal due to the extensive hot functional test period in which each operator will participate.

If you have any difficulties or questions please contact us at (703) 961-6510. We are looking forward to hearing from you.

Sincerely,

Approved by:

*Peter D. Holian*  
Peter D. Holian  
Reactor Supervisor

*Peter D. Holian*  
for T. F. Parkinson, Director

PDH/smw

cc: Dr. Roger A. Teekell, Chairman, Reactor Safety Committee  
Reactor Safety Committee Members  
Mr. Charles Burger, Director, Project and Resident Programs,  
Region II, United States Nuclear Regulatory Commission