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January 28, 1983

NUCLEAR PRODUCTION DEPARTMENT

U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

Attention: Mr. Harold R. Denton, Director

Dear Mr. Denton:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-13
File 0260/0400/L-860.0
Reactor Operator On-Shift
Training Requirements
AECM-83/52

This letter formally documents the telephone discussion held on January 13, 1983, between members of our staff and J. Munro (Operator Licensing Branch) and J. Buzy (Licensee Qualification Branch), on the subject of reactor operator training requirements. As was pointed out in that discussion, the current Grand Gulf Final Safety Analysis Report (FSAR) response to NUREG-0737, Item I.A.2.1, is not consistent with the applicable NRC Staff requirements and is in need of revision. That proposed revision to FSAR subsection 18.1.4 is attached for your review and approval.

The current version of FSAR subsection 18.1.4 requires that senior reactor operator (SRO) candidates who are not licensed reactor operators (RO) at GGNS spend a total of 6 months on-shift time in an under instruction capacity. This requirement is in excess of the guidance provided in the March 28, 1980, H. R. Denton letter to all licensees, which requires only 3 months on-shift under instruction experience in this case.

The current MP&L requirement is relatively restrictive and may cause significant delays in our endeavors to provide an adequate supply of licensed Senior Reactor Operators for the Grand Gulf Nuclear Station.

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An individual who has not held an NRC Operator or Senior Operator License is considered to be an eligible candidate for the Senior Operator License examination, providing he meets the experience requirements and completes the three month on-shift training requirement and the appropriate training course to prepare him for taking the examinations. Similarly, in accordance with the March 28, 1980, Denton letter (Part I.A.2.b), the individual does not have to hold an RO

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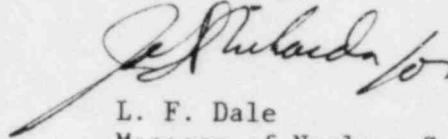
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license on GGNS to meet the intent of operating experience required of the SRO. If the individual has held an RO license on an operating BWR for one year, and (1) meets the SRO experience requirements, (2) completes the required on-shift training, and (3) completes the required RO-to-SRO upgrade training courses, MP&L considers him eligible for an SRO license examination.

Your review and approval of this proposed change is requested by February 18, 1983. Please advise if further information is required.

Yours truly,



L. F. Dale
Manager of Nuclear Services

GWD/JGC/JDR:lm

Attachment: Revised FSAR Page 18.1-5 (with Page 18.1-4 for Continuity)

cc: Mr. N. L. Stampley (w/a)
Mr. R. B. McGehee (w/o)
Mr. T. B. Conner (w/o)
Mr. G. B. Taylor (w/o)

Mr. Richard C. DeYoung, Director (w/a)
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years of nuclear power plant experience. A maximum of two years of power plant experience may be fulfilled by academic or related technical training on a one-for-one time basis.

Prior to initial plant criticality, the applicant shall possess six months of nuclear power plant experience at the Grand Gulf Nuclear Station. This experience may include participation in system acceptance, preoperational testing, and/or writing/verifying plant operating procedures.

After initial plant criticality, the applicant shall possess at least six months of nuclear power plant experience at the Grand Gulf Nuclear Station. The applicant's onsite experience shall include either:

- a. If the Senior Reactor Operator applicant does not hold or has not held an NRC Operator License for a period of one year, the individual must meet the appropriate experience requirements stated above and complete a program of instruction that will end with a Senior Reactor Operator Certification on the GGNS Simulator. In addition the individual must spend a minimum of 520 hours on shift carrying out the duties of the Senior Reactor Operator while under the direct supervision of a Licensed Senior Reactor Operator.
- b. If the Senior Reactor Operator applicant holds or has held an NRC Operator License, the individual shall spend 520 hours on shift carrying out the duties of the Senior Reactor Operator while under the direct supervision of a Licensed Senior Reactor Operator.

Additionally, after initial plant criticality, personnel who hold an Reactor Operator License on GGNS will have held that license for a period of one year prior to being administered an SRO examination.

The highest level of corporate management for plant operations is the Assistant Vice President - Nuclear Production, and he is responsible for certification that each license applicant is able to operate the plant safely and competently prior to proposing the candidate for licensing by the NRC. This certification shall include considerations of successful completion of training, demonstrated abilities, satisfactory health, dependability, and stability.

Licensed Operator Training and Qualification programs at GGNS include training in heat transfer, fluid flow, thermodynamics, and plant transients.

18.1.5 Administration of Training Programs (I.A.2.3)

REQUIREMENT

Pending accreditation of training institutions, training instructors who teach systems, integrated response, transient,

- e. An individual should not work more than 14 consecutive days without having 2 consecutive days off.
- f. In the event that special circumstances arise that require deviation from the above, such deviations should be authorized by the Plant Manager with appropriate documentation of the cause.
- g. If an operator is required to work in excess of 12 continuous hours, his duties should be carefully selected. It is preferable that he not be assigned any task that affects core reactivity or could possibly endanger the safe operation of the plant.
- h. If a Reactor Operator or Senior Reactor Operator has been working more than 12 hours during periods of extended shutdown (e.g., at duties away from the control board), such individuals shall not be assigned shift duty in the control room without at least a 12-hour break preceding such an assignment.

Additional information concerning shift manning is discussed in subsection 13.1.2.1.

18.1.4 Immediate Upgrading of Reactor Operator and Senior Reactor Operator Training and Qualifications (I.A.2.1)

REQUIREMENT

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Applicants for Senior Reactor Operator (SRO) license shall have 4 years of responsible power plant experience, of which at least 2 years shall be nuclear power plant experience (including 6 months at specific plant) and no more than 2 years shall be academic or related technical training. After fuel loading, applicants shall have 1 year of experience as a licensed operator or equivalent.

Certifications that operator license applicants have learned to operate the controls shall be signed by the highest level of corporate management for plant operation.

Applicants must revise training programs to include training in heat transfer, fluid flow, thermodynamics, and plant transients.

RESPONSE

Applicants for a Senior Reactor Operator license at the Grand Gulf Nuclear Station have at least four years of power plant experience. Prior to initial plant criticality, at least one year of this power plant experience shall be nuclear power plant experience. After initial plant criticality, each senior licensed operator candidate shall have at least two