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Arizona Public Service Company

P.O. BOX 53999 • PHOENIX, ARIZONA 85072-0999

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

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March 09, 1992

RECEIVED SECRETARY
U.S. NUCLEAR REGULATORY COMMISSION
MAR 10 1992

Mr. Samuel J. Chilk, Secretary
U. S. Nuclear Regulatory Commission
ATTN: Docketing and Service Branch
Washington, DC 20555

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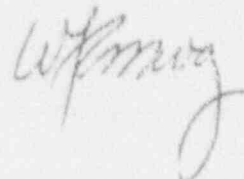
Dear Mr. Chilk:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. SIN 50-528/529/530
Response to Request for Comments Concerning Training and Qualification
of Nuclear Power Plant Personnel (57 FR 537 dated January 7, 1992)
File: 92-056-026

The enclosure to this letter provides the comments of Arizona Public Service Company (APS) in response to the request of the U.S. Nuclear Regulatory Commission regarding 57 FR 537, a proposed rule in which applicants and holders of a license to operate a nuclear power plant are required to establish, implement, and maintain a training program based on a systems approach to training.

APS appreciates the opportunity to comment on this proposed rule and would welcome the opportunity to meet with the Commission or Staff to discuss this issue further.

Sincerely,



WFC/MEP/GEC

Enclosure

cc: A. C. Gehr
A. H. Gutterman

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PDR PR
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RESPONSE TO REQUEST FOR COMMENTS CONCERNING TRAINING
AND QUALIFICATION OF NUCLEAR POWER PLANT PERSONNEL
(57 FR 537 DATED JANUARY 7, 1992)

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Arizona Public Service Company (APS) considers the proposed rule to be a positive step towards endorsing the systems approach to training (SAT) process that utilities have implemented to meet accreditation standards of the National Academy for Nuclear Training (the Academy). As the rule indicates, the impact should be minimal if the population to be included within the scope of the rule truly represents our accredited training population. However, wording such as "On-site technical staff and managers" as well as "Electrical maintenance personnel" and "Mechanical maintenance personnel" raise concerns as to the exact makeup of these groups vis-a-vis our presently accredited programs.

A time frame of 180 days for implementation seems reasonable if the scope of the rule is fully embraced within the utility's accredited training and qualification program. However, if additional programs or populations are really intended, then this time frame may be inadequate. Allowing this rule to be met by programs which are not accredited raises concerns as to future changes in the scope of the rule.

Following are several specific comments and/or questions on various parts of the proposed rule for clarification of exact impacts of the rule on present and future training programs:

The Background section states that "From the NRC's monitoring of industry training programs since the 1985 policy statement went into effect, the NRC has concluded that these programs have been generally effective in ensuring that personnel have qualifications commensurate with the performance requirements of their job." The term "generally effective" is not a complimentary description of the industry training program. The Staff indicates in the Discussion that other approaches to the rulemaking were not evaluated in detail, and no evidence exists that other approaches would provide greater protection of the public's health and safety. Why, then, does the Staff endorse the SAT process if there is belief that there is still room for improvement?

The Discussion of Proposed Rule section includes a tabulation of the elements of the SAT process. This tabulation differs slightly from the traditional elements of analysis, derivation, design, implementation, and evaluation.

The Discussion of Proposed Rule section states that "licensed Operators, such as control room operators and senior control room operators, are not covered by this rule. They will continue to be covered by 10 CFR part 55 for both initial and requalification training." The regulations in 10 CFR 55.59(c) can be met by either paragraphs (c)(1) through (c)(7) of that section, or, in part, by a program

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developed by using the SAT approach. The proposed training rule is more limiting in that it only allows one method of meeting the requirements.

The Discussion of Proposed Rule section states that "Periodic evaluations of the overall training programs are being done within the four-year industry accreditation cycle. The Commission expects the above practice to continue in conformance with this rule." This implies that this accreditation cycle will remain at four years, effectively limiting the flexibility of the Academy to modify the accreditation process over time. For example, it would seem to be contrary to the rule to expand this accreditation period beyond four years. This could effectively pass on the administration of the accreditation program to the NRC, in which case, the existence of the Academy could be redundant.

The Discussion of Proposed Rule section states that "It will be the responsibility of the facility applicant or licensee to ensure that all personnel, licensee and contractor, within the scope of the proposed rule have qualifications commensurate with job performance requirements for those tasks for which they are assigned." The word "contractor" is used in a manner that could significantly expand the applicable population. APS fully agrees that all personnel should be qualified for the work they perform; the concern is that this could be interpreted as a requirement for all contractors (both long-term and short-term) to complete the accredited program.

The Discussion of Proposed Rule section states that "An applicant or licensee could also comply with the requirements of the proposed rule without being accredited." This statement appears to deflate the purpose of maintaining accredited programs if applicants or licensees do not need accreditation to meet the rule. Also, it establishes a framework for the rule to exceed the accredited programs defined by the phrase "... the following nuclear plant personnel: ..."

The Vendor-Developed Programs subpart of the Discussion of Proposed Rule section states "However, it is important to note that vendor training programs are not governed by the proposed rule and that the licensee is ultimately responsible for ensuring that personnel are qualified." Has the NRC established acceptance criteria for this expectation to provide guidance to licensees? Would evaluation criteria be derived from NUREG-1220?

Proposed Section 50.120 states "(b) Requirements. Each nuclear power plant applicant, by (180 days after the effective date of the rule) or 18 months prior to fuel load, whichever is later, and each nuclear power plant licensee, by (180 days after the effective date of the rule), shall establish, implement, and maintain a training program derived from a systems approach to training as defined in 10 CFR 55.4." The implementation period stated in the proposed rule for those plants, including PVNGS, with training programs accredited by the Academy appears to be reasonable. If, however, the resolution of comments on this proposed rule

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establishes a training program that exceeds the current scope of the Academy accredited program, the 180-day schedule may not be sufficient for adequate implementation of the rule.

Proposed Section 50.120 states that "The training program must provide for the training and qualification of the following nuclear power plant personnel: . . . (4) Instrument and control technician . . . (5) Electrical maintenance personnel . . . (6) Mechanical maintenance personnel . . ." The term "instrument and control technician" identifies a clearly definable group of personnel at a plant site; however, the terms "electrical maintenance personnel" and "mechanical maintenance personnel" could encompass a larger and very diverse group. Replacing the term "personnel" in the rule with a more narrowly defined term (such as "currently within the accredited population") would alleviate potential interpretations during implementation of the rule.

Proposed Section 50.120 states that "The training program must provide for the training and qualification of the following nuclear power plant personnel: . . . (9) On-site technical staff and managers . . ." This differs from the currently accredited population as defined by the Academy. The Academy currently accredits training for "technical staff and technical staff managers." The proposed rule could be interpreted to include ALL on-site managers. This could expand the population and include positions for which a training program has not been developed by a formal SAT. Additionally, the technical staff program (as currently accredited) is a generic program and not position-specific for the variety of positions within the technical staff population, and is not formally developed using an SAT. Left to interpretation, this could lead to the development of several additional position-specific training programs.

Proposed Section 50.120 states that "The training program must be periodically evaluated and revised as appropriate to reflect industry experience as well as changes to the facility, procedures, regulations, and quality assurance requirements. The training program must be periodically reviewed by licensee management for effectiveness." Although APS does not propose that this periodicity be specifically stated in the rule, has the Staff envisioned a maximum acceptable period for these evaluations and reviews?

Proposed Section 50.120 states that "Sufficient records must be maintained and kept available for NRC inspection to verify the adequacy of the program." Has the Staff established guidance regarding the scope and extent of "sufficient," and are there any retention periods unique to these records?

In addition to the above comments, APS endorses the comments provided by the Nuclear Management and Resource Council.