

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

May 17, 1984

Mr. Joseph I. McMillan
NRC Region III
Operator Licensing Branch
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. McMillan:

Generic Letter 84-10, Administration of Operating Tests Prior to Initial Criticality, specified requirements for cold license training programs. Perry proposes to meet these requirements by completing the cold license training program as specified in the Perry Final Safety Analysis Report as further amplified in the following:

1. Nuclear fundamentals training, including ten reactor start-ups at a nuclear reactor. Personnel having previous NRC operator licenses or previously qualified as "reactor operators" in the Navy Nuclear Power Program would be construed to have performed ten reactor start-ups without specific documentation of specific manipulation accomplishment.
2. Observation training on shift at a comparable operating reactor. All SRO candidates will complete six weeks, RO candidates four weeks, on shift at an operating commercial BWR.
3. Training on a simulator. All license candidates would complete at least three months in simulator training programs, which includes classroom training directly related to the simulator evolutions or manipulations being performed.
4. Training on actual system design. Each candidate will complete ten weeks of Perry Specific systems training including in-plant walkdowns.

Pending approval of this plan, the following operator examinations are requested:

8406120246 840607
PDR ADOCK 05000440
V PDR

50-440

50-441

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May 17, 1984

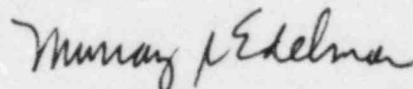
| <u>Date</u> | <u># RO/SRO*</u> | <u>Type of Examination</u> |
|---------------|------------------|-------------------------------------|
| December 1984 | 2/9 | Plant Oral Exam |
| March 1985 | 4/10 | Plant Oral Exam/Written Re-Exam (6) |
| March 1985 | 12/12 | Written/Simulator/Oral |

*Specific numbers of licenses are approximate

It is highly desired that Perry license candidates participate to the greatest extent possible in the Perry start-up test program to gain the experience and in-depth familiarity with Perry systems which the start-up test program provides. Documents such as Generic Letter 84-10 impede achievement of the goal by directly affecting previously approved training and examination plans. Also, these additional experience requirements have discouraged licensing of engineers and management personnel which is a condition that NRC has previously stated it was trying to avoid.

Your timely review, approval and comments to this plan are requested.

Sincerely,



Murray R. Edelman