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Docket No. 50-461

10CFR50.54(a)(3)

Document Control Desk  
Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Revision to the Clinton Power Station  
Shift Technical Advisor Training Program

Dear Sir:

Attached for NRC review and approval is a proposed change to the Clinton Power Station (CPS) quality assurance program description (QAPD) regarding the training program for the Shift Technical Advisor (STA) position.

Currently, Section 13.2 of the CPS Updated Safety Analysis Report (USAR) contains details of the course content and the length of the STA training program. CPS is proposing to remove these details from the USAR. The details of the STA training program will be contained in the CPS STA Training Program Description, a training program based on the systems approach to training as required by 10CFR50.120, "Training and Qualification of Nuclear Power Plant Personnel," and defined in 10CFR55.4. In lieu of describing the details of course content and length, the USAR will be revised to state that the STA training program conforms to the requirements of 10CFR50.120. The STA Training Program Description will not be regarded as part of the QAPD and will not be subject to the provisions of 10CFR50.54(a).

The attachments to this letter identify the specific changes proposed, the reasons for the changes, and the basis for concluding that the revised program incorporating the proposed change will continue to satisfy the criteria of 10CFR50, Appendix B, and the commitments previously accepted by the NRC.

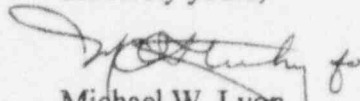
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Illinois Power (IP) has evaluated this change and has concluded that deleting the STA training program details from the USAR constitutes a reduction in the quality assurance program commitment previously accepted by the NRC and requires NRC approval prior to implementing the change. The proposed change will not affect CPS compliance with the provisions of 10CFR50, Appendix B.

IP requests approval of the proposed change within 60 days as provided in 10CFR50.54(a)(3)(iv). IP must receive approval not later than June 30, 1996, to support planned implementation of the change.

Sincerely yours,



Michael W. Lyon  
Director-Licensing

GBS/csm

Attachments: Justification for changes  
Proposed USAR Revision pages

cc: NRC Clinton Licensing Project Manager  
NRC Resident Office, V-690  
Regional Administrator, Region III, USNRC  
Illinois Department of Nuclear Safety

**Revision to the Clinton Power Station (CPS)  
Shift Technical Advisor (STA) Training Program**

Summary and Reason for Proposed Changes

The current CPS USAR contains the details of the STA training program in Section 13.2. The STA training program has been revised to a program based on the systems approach to training as required by 10CFR50.120 and defined in 10CFR55.4. The details of the STA training program will be contained in the STA Training Program Description. IP is proposing to replace the STA training program details currently contained in the USAR with a statement that the program conforms to the requirements of 10CFR50.120 and that the details of the program are contained in the STA Training Program Description.

The current USAR description of the training indicates in Section 13.2 that a minimum of 12 weeks of on-the-job (OJT) training is included in the program. The 12-week minimum was based on the guidance of INPO document GPG-01, "Nuclear Power Plant Shift Technical Advisor," dated April 28, 1981. The proposed change deletes the length of the STA OJT. The length of OJT will be commensurate with the time it takes the specific STA candidate to learn and complete the STA-specific tasks on shift. In accordance with the STA Training Program Description, the content of the program including the length of the OJT portion of the training will be based on job and task analysis using the guidelines of INPO 90-003, "Guidelines for the Training and Qualification of Shift Technical Advisors," dated January 1990. INPO 90-003 replaces INPO document GPG-01.

USAR Appendix D, Sections I.A.1.1 and II.B.4 are being revised to be consistent with the STA qualification and training requirements provided in Section 13.2.

Attached are proposed USAR pages 13.2-4, 13.2-5, 13.2-17, D-3, and D-52. The proposed changes to the pages are identified by a vertical line in the right hand margin.

Basis for Concluding Proposed Change Will Not Affect Compliance with 10CFR50,  
Appendix B

The STA Training Program Description conforms to the requirements of 10CFR50.120. The STA training program is an INPO-accredited program based on a "systems approach to training" using the guidance of the National Academy for Nuclear Training document ACAD 91-016, "The process for Accreditation of Training in the Nuclear Power Industry," and is subject to the periodic accreditation renewal process. The USAR maintains the requirement to have trained and qualified personnel performing the STA function and to ensure that suitable proficiency is maintained.

On-the-job training is conducted for a minimum of 13 weeks using the evaluation measures that address the performance requirements for Senior Reactor Operators. As a part of this training, each applicant for a license will successfully manipulate the facility controls to perform five significant control manipulations affecting reactivity or power level.

The Vice President will provide certification to the Nuclear Regulatory Commission that Senior Reactor Operator candidates have successfully completed the Illinois Power Company requirements to be licensed to operate Clinton Power Station and that the candidate is needed as a licensed operator to perform licensed duties. This certification will be based on recommendations from the Manager-Nuclear Training and Support and the Manager-Clinton Power Station considering the individuals' technical expertise, reliability, maturity, and analytical ability.

The Senior Reactor Operator Training Program prepares candidates to assume supervisory positions on shift that require a license. Courses on leadership and communications, as well as command responsibilities and administrative requirements are included. Diagnostic and team work skills are presented in the classroom and practiced extensively in the simulator environment.

D. Shift Technical Advisor Training Program

The Shift Technical Advisor (STA) training program is based on a systems approach to training and has been accredited by the Institute of Nuclear Power Operations (INPO) National Academy for Nuclear Training. The program shall implement the requirements of 10CFR50.120, "Training and Qualification of Nuclear Power Plant Personnel." The STA training program was developed using the guidance of INPO 90-003, "Guidelines for the Training and Qualification of Shift Technical Advisors." The content of the program and the specific requirements for implementation are identified in the Shift Technical Advisor Training Program Description.

Training on the use of equipment and systems to control or mitigate accidents in which the core is severely damaged has been developed using the guidance INPO 87-021, "Guideline for Training to Recognize and Mitigate the Consequences of Core Damage." The mitigation of core damage training has been incorporated into the applicable portions of the classroom, simulator, and on-the-job training portions of the program.

STAs assuming the responsibilities of the position shall be proficient. Proficiency is maintained by assuming the duties of the position for three 8-hour shifts per quarter and participating in the continuing training program. To regain proficiency, the STAs must stand a watch under instruction and be participating in the STA continuing training program, thereby, ensuring that their knowledge of procedure changes and facility modifications is current. The STA continuing training requirements are in the Operations Continuing Training Program Description.

E. Licensed Operator Regualification Training Program

The Licensed Operator Regualification Training Program provides continuing training for licensed personnel to maintain and enhance the performance and professionalism of each licensed individual and control room team to achieve the high standards required for nuclear plant safety and reliability. This performance-based program was designed and is maintained using the guidance provided by INPO 86-025, Rev. 1, "Guidelines For Continuing Training of Licensed Personnel."

The Licensed Operator Regualification Training Program is delineated in the associated training program description and Nuclear Training Department procedures. These documents specify the program requirements and methods for establishing the program curriculum.

F. Shift Supervisor Training Program

The Shift Supervisor Training Program supports the process for selecting and training Shift Supervisor candidates. This training program builds on the candidate's Senior Reactor Operator knowledge, skills and abilities enabling them to perform the duties of the Shift Supervisor. After initial qualification as Shift Supervisor, the professional development phase of the program provides the opportunity to strengthen their management, leadership, analytical and teamwork skills.

The Shift Supervisor Training Program Description specifies the program curriculum and requirements. This program was developed using ACAD 90-019, "Guidelines for Shift Supervisor Selection, Training and Qualification and Professional Development." The program was designed to ensure that Shift Supervisors receive training addressing supervisory principles needed to successfully perform their duties.



2. Inadequate performance on an annual operating test;
  3. Significant deficiencies associated with required formal lecture series (quiz performance or attendance); or
  4. Significant licensed duty performance deficiencies identified by the individual's functional supervisor or during the conduct of the regualification program simulator training.
- D. Licensed individuals who fail the biennial written examination or the annual operating test shall be promptly removed from licensed duties until they have satisfactorily completed an accelerated retraining program. Licensed individuals shall not be placed in an active status until the requirements of 10CFR55 are satisfied.

#### 13.2.2.1.6 Exemptions

Individuals who maintain Reactor Operator or Senior Reactor Operator licenses for the purpose of providing backup capability to the operating staff shall participate in the regualification program. Individuals who hold licenses for limited license duties will only be required to participate in those regualification activities applicable to their responsibilities.

#### 13.2.2.2 Refresher Training for Unlicensed Personnel

##### 13.2.2.2.1 Specialist Refresher Training

Specialist Refresher Training is conducted by the respective departments on a periodic basis to ensure minimum qualifications for all personnel.

##### 13.2.2.2.2 Shift Technical Advisor Refresher Training

Shift Technical Advisor continuing training requirements are addressed in section 13.2.1.1.1.D.

NRC ACTION PLAN (NUREG-0660 as clarified by NUREG-0737)

I.A.1.1 Shift Technical Advisor

NRC Position

Each licensee shall provide an on-shift technical advisor to the shift supervisor. The shift technical advisor (STA) may serve more than one unit at a multiunit site if qualified to perform the advisor function for the various units.

The STA shall have a bachelor's degree or equivalent in a scientific or engineering discipline and have received specific training in the response and analysis of the plant for transients and accidents. The STA shall also receive training in plant design and layout, including the capabilities of instrumentation and controls in the control room. The licensee shall assign normal duties to the STAs that pertain to the engineering aspects of assuring safe operations of the plant, including the review and evaluation of operating experience.

CPS Response

The STA program is addressed in USAR section 13.1.2.2.2, Shift Technical Advisor and section 13.2.1.1.1.D, Shift Technical Advisor Training Program.

NRC ACTION PLAN (NUREG-0660 as clarified by NUREG-0737)

#### II.B.4 Training for Mitigating Core Damage

##### NRC Position

Licensees are required to develop a training program to teach the use of installed equipment and systems to control or mitigate accidents in which the core is severely damaged. They must then implement the training program.

##### CPS Response

Training on the use of equipment and systems to control or mitigate accidents in which the core is severely damaged has been developed using the guidance of Institute of Nuclear Power Operations (INPO) document INPO 87-021, "Guideline for Training to Recognize and Mitigate the Consequences of Core Damage." The scope of this program is described in section 13.2.1.1.1.