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U-602589
L30-96(05-28)LP
1A.120

May 28, 1996

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
Licensed Operator Requalification 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 Licensed Operator Requalification Training Program.

Currently, Section 13.2 of the CPS Updated Safety Analysis Report (USAR) contains details of the course content and the length of the Licensed Operator Requalification Training Program. CPS is proposing to remove these details from the USAR. The details of the program will be contained in the CPS Operations Continuing Training Program Description, a training program based on the systems approach to training as allowed by 10CFR55.59(a)(2)(iii) 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 program conforms to the requirements of 10CFR55. The Operations Continuing 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 reason 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.

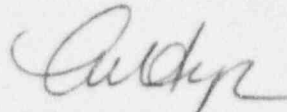
Illinois Power (IP) has evaluated this change and has concluded that deleting the Licensed Operator Requalification Training Program details from the USAR constitutes a reduction in the quality assurance program commitment previously accepted by the NRC and requires NRC approval prior to implementing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

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Add: NRE/DRCH/HAFB
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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 July 31, 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)
Licensed Operator Requalification Training**

Summary and Reason for Proposed Changes

The current CPS USAR contains the details of the Licensed Operator Continuing Training Program in Section 13.2. This training program has been revised to a program based on the systems approach to training as allowed by 10CFR55.59(a)(2)(iii) and defined in 10CFR55.4. The details of the training program will be contained in the Licensed Operator Continuing Training Program Description. IP is proposing to replace the training program details currently contained in USAR with the following:

The Licensed Operator Requalification Training Program is based on a systems approach to training and has been accredited by the Institute of Nuclear Power Operations National Academy for Nuclear Training. The training program shall implement the requirements of 10CFR55, "Operators' Licenses," and use the guidance of National Academy for Nuclear Training document INPO 86-025, "Guidelines for Continuing Training of Licensed Personnel."

Attached are proposed USAR pages 1.8-21 and 13.2-11. The proposed changes to the pages are identified by a vertical line in the right hand margin. Pages 13.2-12 through 13.2-17, which previously contained the training program details in sections deleted by this change, are not attached. The proposed change to page 1.8-21 reflects the revised CPS QAPD commitment to Regulatory Guide 1.8, Personnel Selection and Training.

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

The Licensed Operator Continuing Training Program Description conforms to the requirement of 10CFR55. The CPS Licensed Operator Continuing training program is an INPO-accredited program based on a "systems approach to training" using the guidance of the National Academy of 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 Operator function and to ensure that suitable proficiency is maintained.

Regulatory Guide 1.8, Proposed Rev. 2 (February 1979) (Cont'd)

It is believed that there are numerous power plant duties having no safety significance that can be performed by an operator in an entry level position. This individual can receive on-the-job and formal training while contributing to plant productivity.

4. Reference: ANSI/ANS-3.1-1978, Paragraph 4.6.1 - The engineer in charge of technical support may not possess all specified qualifications. However, adequately qualified personnel will be available in the company engineering staff or through consultants to assist the engineer in charge.
5. Reference: ANSI/ANS-3.1-1978, Paragraph 4.7 - Independent review is provided by the Nuclear Review and Audit Group (NRAG) and the Independent Safety Engineering Group (ISEG). The NRAG is a standing committee and the ISEG is an organizational unit. Since the NRAG is a standing committee paragraph 4.7.1 is not applicable to its members, but paragraph 4.7.1 does apply to the members of ISEG.
6. Reference: ANSI/ANS-3.1-1978, Paragraph 4.7-2 - Exception is taken to the qualification requirements for the staff specialists for the review committee. The review committee is required to contain personnel with expertise in all of the appropriate areas. When such expertise is not available on the review committee unit, the expertise will be available in the company or from outside consultants.
7. Reference: ANSI/ANS-3.1-1978, Section 5.2 and Section 5.5 - Exception is taken to Section 5.2 "Training of Personnel to be Licensed by the NRC" and Section 5.5 "Operator Retraining and Replacement Training." The Clinton Power Station Licensed Operator Initial and Continuing Training Programs are accredited by the Institute of Nuclear Power Operations (INPO) National Academy for Nuclear Training. These programs are based on a systems approach to training (SAT) using the guidance of National Academy for Nuclear Training document ACAD 91-016, "The Process for Accreditation for Nuclear Training in the Nuclear Power Industry." These programs shall meet the requirements of 10CFR55, "Operators' Licenses."

USAR Subsection: 12.5.1, 13.1.3.1, 13.1.3.3, 13.2.1.1.1, 13.2.3, 14.2.2.5, TS 5.3.1, and ORM 6.4.1.

13.2.2 Continuing Training

Continuing training of Illinois Power Company's Nuclear Program personnel will be conducted in accordance with ANSI-3.1-1978. This training is designed to ensure the ongoing competency of employees in the performance of their duties.

13.2.2.1 Licensed Operator Regualification Training Program

The Licensed Operator Regualification Training Program is based on a systems approach to training and has been accredited by the Institute of Nuclear Power Operations National Academy for Nuclear Training. The training program shall implement the requirements of 10CFR55, "Operators' Licenses" and use the guidance of National Academy for Nuclear Training document INPO 86-025, "Guidelines for Continuing Training of Licensed Personnel."

The content of the program and the specific requirements for implementation are identified in the Operations Continuing Training Program Description.

13.2.2.1.1 Deleted

13.2.2.1.2 Deleted

13.2.2.1.3 Deleted

13.2.2.1.4 Deleted

13.2.2.1.5 Deleted

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.