

GPU Nuclear Corporation
Post Office Box 388
Route 9 South
Forked River, New Jersey 08731-0388
609 971-4000
Writer's Direct Dial Number:

January 4, 1993
C321-92-2347

Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen,

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Request for Scheduler Exemption from
Requalification Testing Requirements

Ref: NRC Letter from Alexander W. Dromerick to John J. Barton,
dated April 10, 1992.

Pursuant to 10 CFR 55.11, GPUN hereby requests a one-time scheduler exemption from the requirements of 10 CFR 55.59(a)(1) and (c)(1), which require a licensed operator requalification program to be conducted for a continuous period not to exceed 24 months in duration. GPUN is requesting an extension of the current program duration from 24 to 32 months to allow the comprehensive written exam required by 10 CFR 55.59(a)(2) to be administered by the NRC during August 1993.

The new plant referenced simulator is scheduled to be ready for conducting operator evaluations during August 1993, therefore this exemption would allow the administration of both the written and operating portions of the requalification exam at one time. This particular requalification exam must be administered by the NRC in order to enable three operators whose licenses expire in 1993 to meet 10 CFR 55.57 license renewal requirements.

Background

The NRC letter referenced above granted GPUN a temporary scheduler exemption from the filing requirement of 10 CFR 55.45(b)(2)(iii) to allow for the submittal of NRC Form-474, "Simulation Facility Certification", after the March 26, 1991 deadline provided in the rule, but no later than December 31, 1992. Accordingly, the Oyster Creek plant referenced simulator will be certified by December 31, 1992, and is scheduled to be ready for operator training by March 1993, and ready for operator evaluation by August 1993.

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The last comprehensive written exams were administered between March 5, 1991 and June 10, 1991. Therefore, 10 CFR 55.59(a)(1) and (c)(1) require the next comprehensive written exams to be administered by March 5, 1993 for some operators (no more than 24 months between successive exams). This date is approximately five months before the simulator will be ready for conducting the annual operating test required by 10 CFR 55.59(a)(2). In addition, three operators whose licenses will expire in October/November 1993 have not yet had a comprehensive requalification written exam and operating test administered by the NRC during the term of their six-year licenses as required by 10 CFR 55.57(b) for license renewal.

In previous telephone conversations with the NRC Region 1 Operations Branch, the above scheduler constraints were identified and various options were discussed. The availability of NRC resources for administering a written and operating exam within these constraints was also discussed. Consequently, the administration of both written and operating exams in August 1993 was considered a viable option provided the subject exemption could be granted.

Exemption Justification

Application of the regulation in this particular circumstance is not necessary to achieve the underlying purpose of the rule. Comprehensive requalification written exams and operating tests are administered to determine areas in which retraining is needed to upgrade licensed operator knowledge. 10 CFR 55.59 (a)(1), (a)(2) and (c)(1) establish the frequency for this process; a comprehensive written exam is required every 24 months and an operating test is required every calendar year. Each 24 month cycle begins a new "requalification program". In this way, a licensed operator would participate in three consecutive requalification programs during the term of a six year license. The extension of the current program duration from 24 to 32 months to accommodate the administration of a written exam in August 1993 will not have a negative impact on the overall process of upgrading operator knowledge.

The exemption would provide only temporary relief from the scheduler requirements of 10 CFR 55.59(a)(1) and (c)(1) and the exemption would only apply to the completion date of the comprehensive written exam. All other elements of the current requalification program will be conducted in accordance with applicable regulations. The Oyster Creek licensed operator training programs are accredited by the Institute of Nuclear Power Operations and are based on a systematic approach to training. This temporary scheduler exemption will not reduce the effectiveness of the requalification program.

GPUN has made good faith efforts to comply with the regulation. Considerable effort has been made to obtain a certifiable plant referenced simulator at the earliest possible date for operator training and evaluation. The simulator is scheduled to be ready for operator training by March 1993, and ready for operator evaluation by August 1993. This schedule reflects the need to conduct 3 cycles (6 months) of training on the simulator before an exam can be

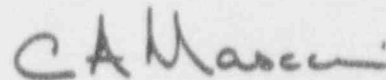
conducted on the simulator. As stated above, GPUN contacted the NRC to discuss options for conducting operator exams in 1993. We believe this exemption is the most logical resolution to the scheduling difficulties in meeting 10 CFR 55.59 operator requalification requirements during this transitional period when the new plant referenced simulator is being integrated into our operator training programs.

The NRC regulations, specifically 10 CFR 55.11, provide that exemptions may be granted from the requirements of 10 CFR 55 if the exemptions are "authorized by law and will not endanger life or property and are otherwise in the public interest". On the basis of the information provided above, we conclude that this exemption is justified under the standards of 10 CFR 55.11.

We are confident that our operators will continue to possess the required level of knowledge, skills and abilities needed to safely operate the plant throughout this transitional period.

If there are any questions regarding this matter, please call Mr. Michael Heller, Licensing Engineer, at (609) 971-4680.

Sincerely,



C.A. Mascari
Vice President & Director
Nuclear Assurance

cc: NRC Document Control Desk
Mr. L. Bettenhausen, NRC Region I
Senior NRC Resident Inspector
Oyster Creek NRC Project Manager