

Omaha Public Power District
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Omaha, Nebraska 68102-2247
402/636-2000

February 12, 1993
LIC-93-006

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

Reference: Docket No. 50-285

Gentlemen:

SUBJECT: Request for a One-Time Scheduler Exemption From Fitness for Duty Requirements

Title 10 of the Code of Federal Regulations, Part 26.21, subsection (b) requires, in part, that Fitness-For-Duty (FFD) refresher training be completed on a nominal twelve month frequency or more frequently where the need is indicated. Omaha Public Power District (OPPD) requests a one-time exemption from 10 CFR 26.21(b) for the reasons noted below.

OPPD currently provides FFD refresher training as part of general employee requalification training (GERT). OPPD plans to train all personnel with unescorted access to Fort Calhoun Station (FCS) on the new requirements of 10 CFR 20 by July 1, 1993. This will also be done as part of GERT. To complete the training by July 1, 1993, a portion of the FCS badged population (i.e., those with GERT normally scheduled in the months of July through November, 1993) will receive this training on an schedule accelerated by approximately six months. Thus, the entire badged population will receive GERT, including the FFD refresher training, before July 1993. OPPD then intends to restore the original GERT schedule in 1994. Therefore, some individuals noted above on the accelerated schedule for 1993 may not receive their next GERT until approximately 18 months later in 1994, which is a longer interval than 10 CFR 26.21(b) presently allows. This is intended to be a one-time exemption; however, it is consistent with information indicating that the NRC is considering extension of the 10 CFR 26.21(b) interval to 24 months.

A one-time exemption from the nominal twelve month frequency will allow OPPD to continue providing refresher FFD training in conjunction with GERT, instead of scheduling separate training sessions exclusively for the refresher FFD training. This will ensure a consistent and organized transfer of critical training information. FCS personnel have received FFD refresher training regularly in each of the last three years. OPPD is confident that affected personnel understand the program and that no adverse impact will result from this requested delay. Managerial and Supervisory personnel will continue to receive FFD refresher training on a nominal twelve month interval consistent with the requirements of 10 CFR 26.22.

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If you should have any questions, please contact me.

Sincerely,

W. G. Gates

W. G. Gates
Vice President

WGG/grc

c: LeBoeuf, Lamb, Leiby & MacRae
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