

**Florida
Power**
CORPORATION

July 23, 1985
3F0785-16

Director of Nuclear Reactor Regulation
Attention: Mr. Hugh L. Thompson, Jr., Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
NUREG-0737, Items I.A.2.1(4) and II.B.4
Replacement Operator Training (ROT) Program

Dear Sir:

Florida Power Corporation (FPC), with this letter, is clarifying its commitment relative to training in the use of installed plant systems to control or mitigate an accident in which the core is severely damaged, as this training requirement relates to the Replacement Operator Training Program for RO and SRO candidates. Any clarification regarding training commitments in this subject matter for other personnel will be by separate correspondence.

The following references are applicable to this clarification and helpful in adding perspective to FPC's original statement of commitment, and supporting our commitment clarification.

- (1) NUREG-0737, Items I.A.2.1(4) & II.B.4 (Denton letter, 3/28/80, Enclosure 1, A.2.c(2) & Enclosure 3).
- (2) FPC's letter dated 9/15/80, J. A. Hancock to P. F. Collins, Item 2.C.2 (should have been item A.2.c.2, in reference to Enclosure 1 of Denton's letter).
- (3) FPC's letter dated 12/15/80, P. Y. Baynard to D. G. Eisenhut, Items I.A.2.1 and II.B.4.

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- (4) Inspection Report 50-302/81-15, dated 9/24/81, paragraph 8.c.
- (5) FPC's letter dated 5/5/82, D. G. Mardis to J. F. Stolz, Question/Response Nos. 2, 3, 4, & 8.
- (6) FPC's letter dated 2/21/83, P. Y. Baynard to J. F. Stolz, Question/Response Nos. 2 & 4.
- (7) NRC Safety Evaluation dated 4/6/83, J. F. Stolz to W. S. Wilgus.

The specific requirement basis as it relates to replacement operator training (ROT) is stated in Reference (1). Licensees are required to develop and implement a training program to teach the use of installed equipment and systems to control or mitigate accidents in which the core is severely damaged. Enclosure 3 to Denton's letter provides guidance for initial training of personnel in the subject material.

FPC did develop and implement the subject training program (see Reference (4)) which then became FPC's focus for subsequent responses to NRC questions. This narrow focus caused communication difficulty as evidenced by two rounds of nearly identical questions (see References (5) & (6)). Questions 4 and 8 (Reference (5)) and Questions 2 and 4 (Reference (6)) invite FPC to provide an outline of the training program together with the number of training hours involved, and "... can include any training program (course/lecture) which relates to the training for mitigating core damage." FPC's response with unchanging focus indicated each program includes sixteen (16) hours of accident mitigation training, still not considering other ROT program subjects that relate directly to detection and mitigation of accidents in which the core is severely damaged.

At this time, it is essential that FPC clarify its commitment as follows:

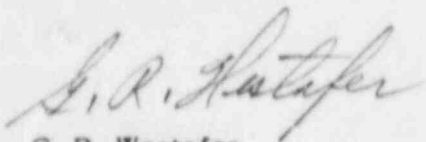
FPC will provide training via the Replacement Operator Training Program for RO and SRO candidates in the use of installed plant systems to detect and control or mitigate an accident in which the core is severely damaged. This training will address as a minimum but not be limited to the topics identified in Reference (1). The time requirements for this training may change depending on task analysis and plant modifications.

Presently, the required training takes place in a combination of subjects in addition to Degraded Core (no longer 16 hours), the program specifically developed in response to the Denton letter, Enclosure 3. Other subjects include: Post Accident Sampling System; applicable ATOG's (Loss of Coolant, Steam Generator Tube Rupture, Over & Under Cooling); applicable Emergency Procedures (Loss of Feedwater, Loss of Coolant, Inadequate Core Cooling, Steam Generator Tube Rupture & Over Cooling); SPDS; and Plant Computer. This list of topics may change from time to time, as may the time spent on any topic, depending on task analysis, plant modifications, and procedure changes.

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This FPC commitment continues to be consistent with the Safety Evaluation Report on the subject items (Reference 7).

If there are any questions, please contact this office.



G. R. Westafer
Manager, Nuclear Operations
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DEP/feb

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