

**Florida
Power**
CORPORATION

July 23, 1985
3F0785-27

Director of Nuclear Reactor Regulation
Attention: 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, Item I.A.2.1(4)
Replacement Operator Training Program Revision

Dear Sir:

Florida Power Corporation (FPC), with this letter, is revising its commitment related to the training of replacement reactor operator and senior reactor operator candidates in heat transfer, fluid flow and thermodynamics.

The following references are applicable to this issue and helpful in drawing a perspective on FPC's original commitment, and the basis for this revised commitment.

- (1) NUREG-0737, I.A.2.1(4) (Denton letter dated March 8, 1980, Enclosure 1, A.2.c.1 and Enclosure 2).
- (2) FPC letter dated 9/15/80, J. A. Hancock to P. F. Collins (Item 2.C.1).
- (3) FPC letter dated 12/15/80, P. Y. Baynard to D. G. Eisenhut (Item 2.A.1.2).
- (4) Inspection Report 50-302/81-15, dated 9/24/81, paragraph 8.b.
- (5) FPC letter dated 5/5/82, D. G. Mardis to J. F. Stolz, Question/Response Nos. 1 & 4.
- (6) FPC letter dated 2/21/83, P. Y. Baynard to J. F. Stolz, Question/Response Nos. 1 & 4.
- (7) NRC Safety Evaluation dated 4/6/83, J. F. Stolz to W. S. Wilgus, Item I.A.2.1.

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The requirement per reference (1) for license applicant's enhanced training in these subjects is, in part, "Training programs shall be modified, as necessary to provide: 1) Training in heat transfer, fluid flow and thermodynamics.", with specific detailed guidance provided by Reference (1), Enclosure 2.

Initial implementation of this enhancement, and continuing as the commitment until the present, was accomplished by including appropriate training totally in the Replacement Operator Training Program. A measure of the current commitment (Reference 6) is 42 hours of training in the subject material.

In the future, however, prospective reactor operator and senior reactor operator candidates will be trained per the criteria in heat transfer, fluid flow, and thermodynamics in some combination of curricula of the Replacement Operator Training Program and the Non-Licensed Operator Training Program, which precedes it.

Reactor Operator and Senior Reactor Operator upgrade candidates will have received the required training from the combined curricula of both programs by the time they are certified for the NRC License Examination.

Instant SRO candidates will have received equivalent training based upon review of applicable class/training transcripts, additional training by participation in the Replacement Operator Training Program, and supplemental courses as necessary.

The commitment revision, as stated in the previous three paragraphs is evaluated to be an improvement to both programs. The revision continues to meet the requirement of TMI Action Item I.A.2.1.4 for RO and SRO training, and the SER transmitted April 6, 1983. Current job and task analysis indicates the need for heavy heat transfer, fluid flow and thermodynamics training in the Non-Licensed Operator Training Program. The Replacement Operator Training Program will review and supplement this initial training as necessary.

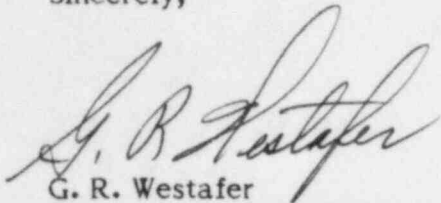
A Safety Evaluation of the change has been conducted. There is no decrease in the training received, only a movement of the training to an earlier point, therefore, there is no increased probability of an occurrence or the consequences of an accident or malfunction of equipment as previously evaluated. The operator will still possess the same knowledge to operate in a safe and reliable manner, only earlier. We see no created possibility for an accident or malfunction not previously reviewed.

Present assessment (not part of the commitment) indicates that the subject training will take place primarily in the Non-Licensed Operator Training Program (approximately 52 hours) with the Replacement Operator Training Program (approximately 28 hours) providing primarily review and refresher training. The Non-Licensed Operator Training Program requires the same standards of performance and uses the same grading criteria (80/70 criteria) as the Replacement Operator Training Program.

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If there are any questions, please contact this office.

Sincerely,

A handwritten signature in cursive script, appearing to read "G. R. Westafer".

G. R. Westafer
Manager, Nuclear Operations
Licensing and Fuel Management

DEP/feb

cc: Dr. J. Nelson Grace
Regional Administrator, Region II
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