

**Florida
Power**
CORPORATION

July 23, 1985
3F0785-13

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.2.3
Instructor Qualifications Clarification

Dear Sir:

Florida Power Corporation (FPC), with this letter, is clarifying its commitment regarding Qualification of Instructors who teach systems, integrated responses, transient and simulator courses in the Replacement Operator Training Program and/or Licensed Operator Requalification Training Program.

The following references are applicable to this issue and helpful in the clarification of FPC's commitment regarding Instructor Qualification.

- (1) NUREG-0737 (I.A.2.3) (Denton letter, 03/28/80, Enclosure 1, A.2.d & A.2.e).
- (2) FPC's letter dated 12/15/80, P. Y. Baynard to D. G. Eisenhut, Item I.A.2.3.
- (3) FPC's letter dated 5/5/82, D. G. Mardis to J. F. Stolz, Question/Response No. 5.
- (4) FPC's letter dated 2/21/83, P. Y. Baynard to J. F. Stolz, Question/Response No. 3.
- (5) FPC's Licensed Operator Requalification Training Program (Rev. 1, 3/15/85), Section 9, Instructor Qualification.
- (6) NRC Inspection Report 50-302/85-01 dated 4/25/85; Report Detail, para. 7.

The requirement based in NUREG-0737, and FPC's commitment, is in two parts. This letter is provided to restate FPC's commitment regarding the extent of Instructor Qualification, in order to eliminate any misunderstanding.

- (A) First, regarding initial competence demonstration: Reference (1) states, "Training center and facility instructors who teach systems, integrated responses, transient and simulator courses shall demonstrate their competence to the NRC by successful completion of a senior operator examination."

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FPC's commitment in this regard, contained in Reference 2, has been misunderstood to mean an SRO examination on CR-3 was required. (Reference 2 has also been misunderstood to mean maintaining licensed SRO status was required.)

FPC's commitment for initially demonstrating instructor competence is, and has been: instructors who teach systems, integrated responses, transients and simulator courses in the Licensed Operator Requalification Training Program or in the Replacement Operator (RO & SRO) Training Program, will have first successfully completed a senior operator exam, either at CR-3, or at another pressurized water reactor (PWR) facility.

Although the normal practice may be that subject instructors complete the SRO examination on CR-3 and the majority subsequently become licensed so as to also hold backup license status, FPC's commitment is not restrictive to this extent. FPC's commitment provides for utilizing instructors that, perhaps because of health reasons, are not currently licensed, and for the utilization of NRC certified instructors that have not completed an SRO examination at CR-3.

- (B) Second, regarding maintenance of instructor qualification: Reference (I) states, "Instructors (who teach systems, integrated responses, transient and simulator courses) shall be enrolled in appropriate requalification programs to assure they are cognizant of current operating history, problems, and changes to procedures and administrative limitations."

FPC's commitment in this regard, unclearly stated in References 3 and 4, has been misunderstood to mean that all instructors (with the exception of guest lecturers) will be enrolled and participate in the total Licensed Operator Requalification Training Program described by Reference 5.

FPC's commitment for maintaining instructor qualification for instructors who teach systems, integrated responses, transient and simulator courses in the Licensed Operator Requalification Training Program or in the Replacement Operator (RO & SRO) Training Program is in two parts as follows:

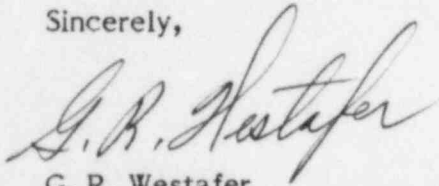
1. Instructors who are licensed operators at CR-3 and who are maintaining license status will be enrolled in the total Licensed Operator Requalification Training Program as a condition of their license.
2. The remainder of the subject instructors on the other hand (operations instructors that had been licensed operators on CR-3 or another PWR or certified by the NRC as instructors on CR-3 or another PWR) will perform normal work practices as well as be enrolled in appropriate

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refresher training together designed to assure that they are maintaining a high degree of cognizance in current operating history, problems, and changes to procedures and administrative limits. In practice now, as was the practice and intent at the time of the commitment, enrollment in and satisfactory completion of appropriate and selected parts and subparts of the Licensed Operator Requalification Training Program is the vehicle by which formal refresher training elements of the commitment are satisfied.

If you have any questions resultant from this clarification of commitment regarding Instructor Qualifications, please contact this office.

Sincerely,



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

DEP/feb

cc: Dr. J. Nelson Grace
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