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BRANCH

July 15, 1985

James P. Gleason, Chairman
Atomic Safety and Licensing Board
513 Gilmore Drive
Silver Spring, MD 20901

Dr. Jerry R. Kline
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. Glenn O. Bright
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Re Cleveland Electric Illuminating Co. (Perry Nuclear Power
Plant, Units 1 and 2), Docket Nos. 50-440 and 50-441 *OC*

Gentlemen:

For your information, Intervenor Ohio Citizens for Responsible Energy ("OCRE") has enclosed documents relevant to Issue #8, on hydrogen control, now before the Board, and of general relevance as to Applicants' fuel load date for Perry Unit 1.

At Tr. 3609 and 3660 there was discussion of the Reactor Core Isolation Cooling System ("RCIC") and its function in a station blackout accident. Attachment 1 is a report filed by Applicants pursuant to 10 CFR 50.55(e) describing a deficiency which would render RCIC inoperable during a station blackout. It is not apparent from the report whether this deficiency will be corrected.

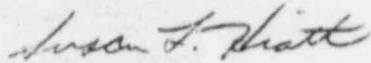
At Tr. 3441-3444 and 3450-3453 there was discussion of emergency procedure guidelines relating to containment venting and containment spray operation. Attachment 2 is a portion of the PNPP-specific technical guidelines (Primary Containment Control Guidelines); the statements therein tend to contradict the statements made by Applicants' witnesses at the hearing. (Although this document is dated January 1985, it was not made available in the LPDR until July 10, 1985.)

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Attachment 3 is an NRC Inspection Report which discusses negative trends in PNPP preoperational testing and poorer than desirable operator licensing examination results; it is stated that the significant concerns in these areas may affect Applicants' projected fuel load date.

Sincerely,



Susan L. Hiatt
OCRE Representative
8275 Munson Rd.
Mentor, OH 44060
(216) 255-3158

Enclosures: as stated
cc: Service List

NO RCIC IN SCOPE

DMC



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 5000 - CLEVELAND, OHIO 44101 - TELEPHONE (216) 622-9800 - ILLUMINATING BLDG. - 55 PUBLIC SQUARE

Serving The Best Location in the Nation

MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

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ATTACHMENT 1

May 22, 1985

PY-CEI/OIE-0046 LQ

Mr. James G. Keppler
Regional Administrator, Region III
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

RE: Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Voltage Drop Affecting RCIC
Valves [RDC 127(85)]

Dear Mr. Keppler:

This letter is the final report pursuant to 10CFR50.55(e) on the potential significant deficiency regarding starting voltage drops in power feeder cables for three valves in the Reactor Core Isolation Cooling (RCIC) System. Mr. J. McCormick-Barger of your office was notified on January 30, 1985, by Mr. T. A. Boss of The Cleveland Electric Illuminating Company that this problem was being evaluated per our Deviation Analysis Report Number 222. Interim reports were submitted on February 28, and April 18, 1985. We have determined that this condition does not constitute a significant deficiency per the requirements of 10CFR50.55(e).

Description of Potential Deficiency

Calculations had indicated that various DC powered valves within the RCIC system might be incapable of operating due to reduced voltage at the valve operators. This condition results upon loss of a battery charger coupled with the voltage drop in the valves' motor circuit conductors.

Results of Evaluation

Section 5.4.6.1 of our FSAR currently states that the RCIC system can be utilized to mitigate the consequences of a Control Rod Drop Accident (CRDA). However, in the event that RCIC system

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May 22, 1985

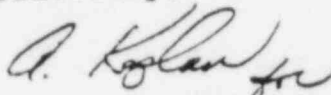
operation becomes impaired due to the loss of a battery charger, the High Pressure Core Spray system would be available to respond. Additionally, the Automatic Depressurization System initiates upon Low Low Reactor Water level, enabling the Low Pressure Core Spray and Low Pressure Core Injection to provide core cooling and reactor inventory make-up.

Discussions with our Nuclear Steam Supply System supplier, General Electric (GE), indicate that they are in agreement with our determination that RCIC is not required to function to mitigate the consequences of a CRDA. Documentation from GE is forthcoming and we will notify you should our position change. The documentation will be evaluated to determine if any changes to our FSAR are required.

In light of the above, the identified condition would not have had a significant impact on the safe operation of the Perry Nuclear Power Plant.

Please call if there are any questions.

Sincerely,



Murray R. Edelman
Vice President
Nuclear Group

MRE:sab

cc: Mr. J. A. Grobe
USNRC, Site Office

Mr. D. E. Keating
USNRC, Site Office

Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
c/o Document Management Branch
Washington, D.C. 20555

Records Center, SEE-IN
Institute of Nuclear Power Operations
1100 Circle 75 Parkway, Suite 1500
Atlanta, Georgia 30339

ATTACHMENT 2

PGP
Page: 1
Rev.: 0

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY
PERRY NUCLEAR POWER PLANT

PROCEDURES GENERATION PACKAGE

Date Prepared: January 7, 1985

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Procedures Generation Package

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PC/P Monitor and control primary containment pressure.

PC/P-1 Operate the following systems, as required:

1. Containment pressure control systems. Use SOI-M11.
2. Drywell purge only when the temperature in the space being evacuated is below 212°F (Maximum Noncondensable Evacuation Temperature). Use SOI-M14.

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If while executing the following steps containment spray has been initiated, when containment pressure drops below (later) psig, terminate containment spray.

PC/P-2 Before suppression chamber pressure reaches the Pressure Suppression Pressure (Figure 2) but only if containment pressure is above (later) psig (Mark III Containment Spray Initiation Pressure Limit), initiate containment spray.

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PC/P-3 If containment pressure cannot be maintained below the Pressure Suppression Pressure (Figure 2), EMERGENCY RPV DEPRESSURIZATION IS REQUIRED.

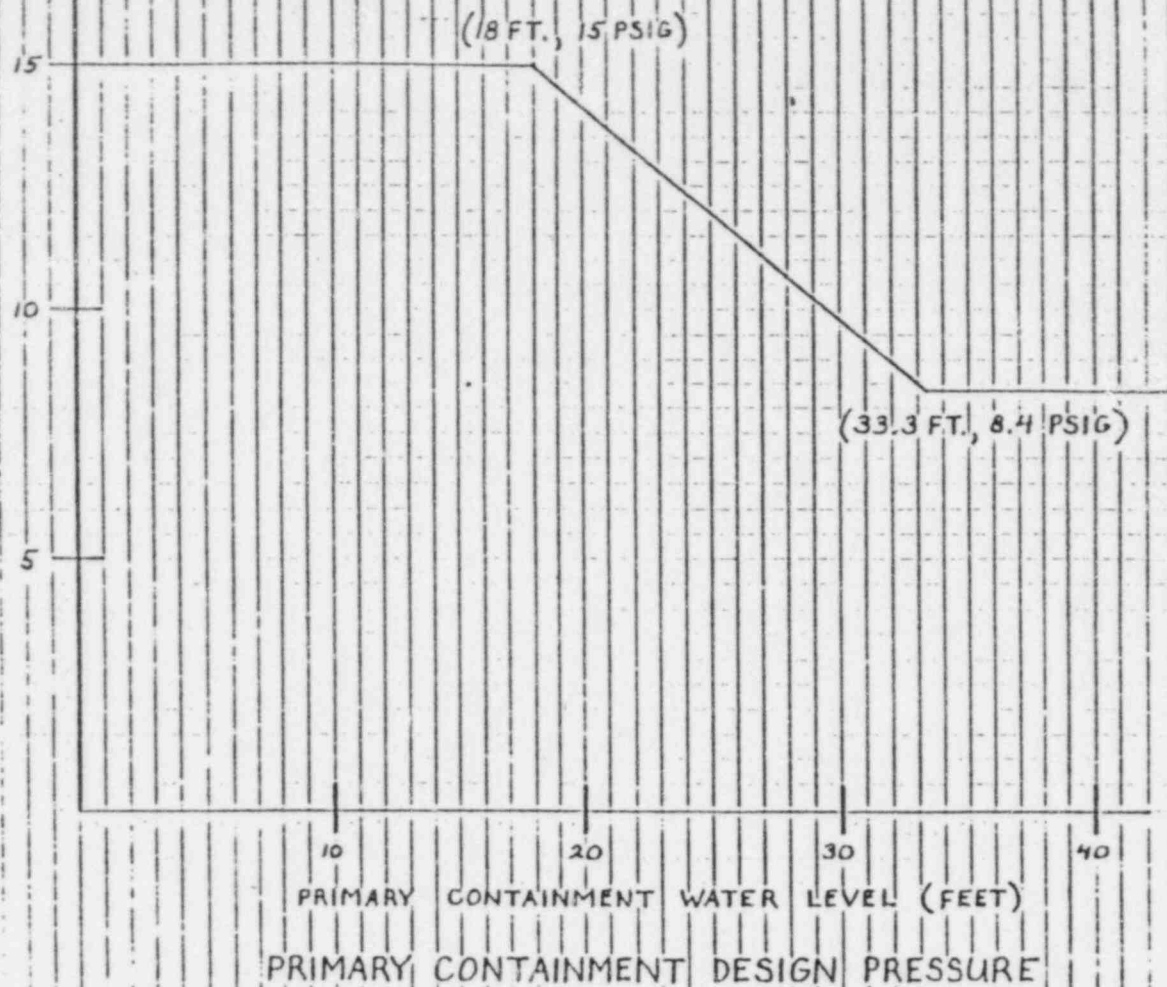
PC/P-4 If containment pressure cannot be maintained below the Primary Containment Design Pressure (Figure 3), RPV FLOODING IS REQUIRED.

PC/P-5 If containment pressure cannot be maintained below the Primary Containment Pressure Limit (Figure 4), then irrespective of whether adequate core cooling is assured, initiate containment spray.

PC/P-6 If containment pressure exceeds the Primary Containment Pressure Limit, then irrespective of the offsite radioactive release rate, vent the primary containment in accordance with (instruction for containment venting) to reduce and maintain pressure below the Primary Containment Pressure Limit.

22

SUPPRESSION CHAMBER PRESSURE (PSIG)



PRIMARY CONTAINMENT DESIGN PRESSURE

Figure 3

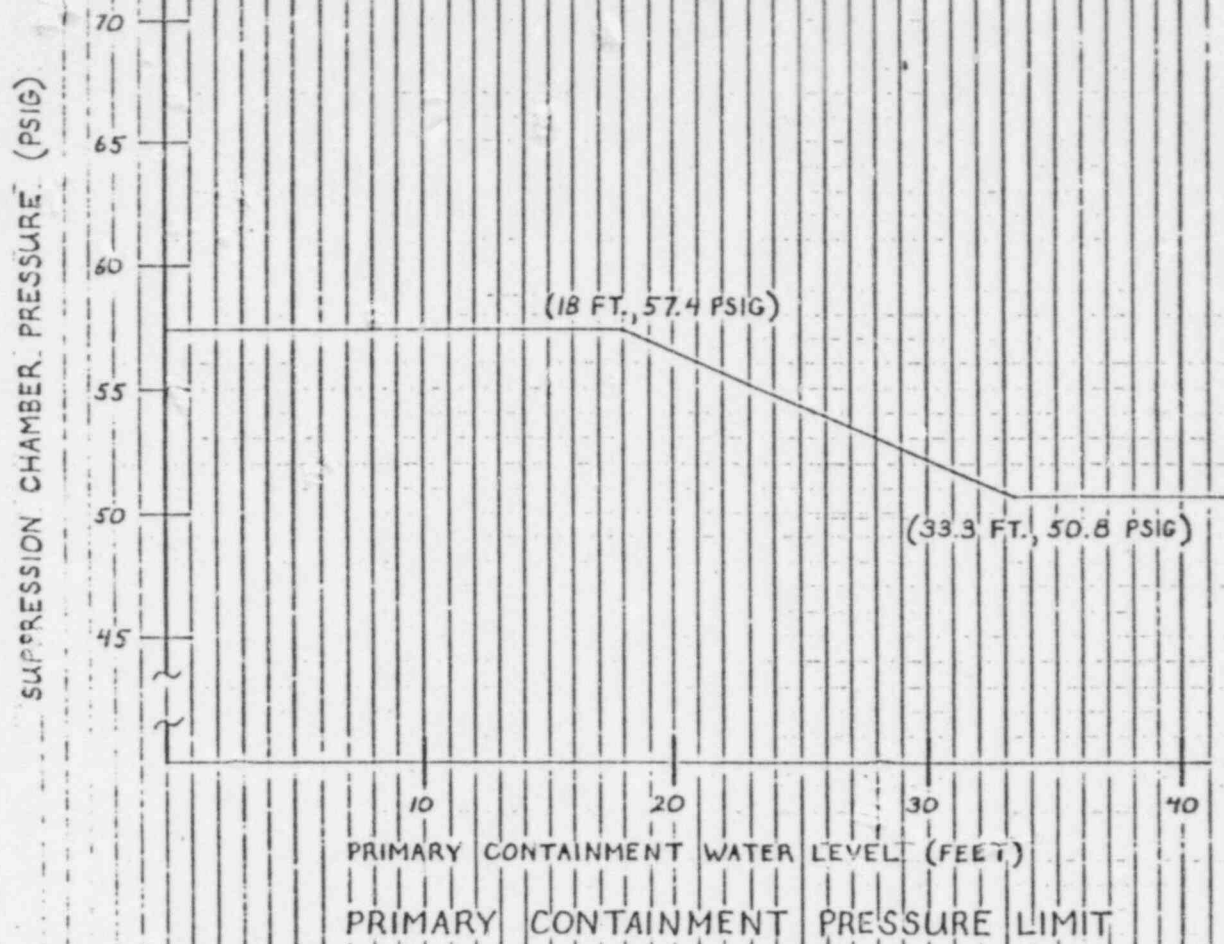


Figure 4

Deviation Sheet: Number 95

EPG Step Number(s): PC/P-7

PSGT Step Number(s): PC/P-6

Deviation:

Phrase "irrespective of the offsite radioactivity release rate" was added

Evaluator: C. S. Orogvany

Date: 11/16/84

Justification:

Under these circumstances, venting is the only mechanism remaining which
could prevent an uncontrolled, unpredictable and possibly irreparable
breach of primary containment. Although venting will probably result in
the release of some radioactivity to the environment, this is preferable
to containment failure whereby adequate core cooling may also be lost and
radioactivity is released with no control whatsoever.

Reviewer: C. S. Orogvany

Date: 11/16/84

Approved: YES NO (N/R) (circle one)

NDAS Lead Engineer: _____

Date: _____

Approved: YES NO (circle one)

GSO: P. Stetman

Date: 12/20/84

Incorporated: W. H. H. H.

Date: 12/21/84

(82)

DMB

JUN 13 1985

Docket No. 50-440

ATTACHMENT 3

The Cleveland Electric Illuminating
Company

ATTN: Mr. Robert M. Ginn
Chairman of the Board and
Chief Executive Officer

Post Office Box 5000
Cleveland, OH 44101

Gentlemen:

This refers to the management meeting conducted with you and members of your staff by Mr. J. G. Keppler and members of the Region III staff on June 3, 1985, regarding preoperational test and operator licensing activities at Perry Nuclear Power Plant, Unit 1, authorized by NRC Construction Permit No. CPPR-148.

The enclosed copy of our inspection report identifies areas discussed during the meeting.

No items of noncompliance with NRC requirements were identified during the course of this meeting.

In accordance with the NRC's Rules of Practice for Domestic Licensing Proceedings, Title 10, Code of Federal Regulations, Part 2, Section 2.790, a copy of this letter and the enclosures will be placed in the NRC Public Document Room.

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used 2/18/85

The Cleveland Electric Illuminating
Company

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JUN 13 1985

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Original Signed by C.E. Norelius

C. E. Norelius, Director
Division of Reactor Projects

Enclosure: Inspection Report
No. 50-440/85036(DRP)

cc w/enclosure:

J. J. Waldron, Manager, Perry
Plant Technical Department
M. D. Lyster, Manager, Perry
Plant Operations Department
L. O. Beck, General Supervising
Engineer, Nuclear Licensing
and Fuel Management Section
DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
Harold W. Kohn, Ohio EPA
Terry J. Lodge, Esq.
James W. Harris, State of Ohio
Robert H. Quillin, Ohio
Department of Health

RIII

McCormick-Barger/kja
06/11/85

RIII

Knop

RIII

Ring
6/11

RIII

Streeter
6/11

RIII

Warnick

RIII

Norelius
6/12

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-440/85036(DRP)

Docket No. 50-440

License No. CPPR-148

Licensee: Cleveland Electric Illuminating Company
Post Office Box 5000
Cleveland, OH 44101

Facility Name: Perry Nuclear Power Plant, Unit 1

Meeting At: NRC Region III Office, Glen Ellyn, IL

Meeting Conducted: June 3, 1985

Reported By: J. A. Grobe

Approved By: R. C. Knop, Chief
Reactor Projects Section 1C

Date

Meeting Summary

Meeting on June 3, 1985 (Report No. 50-440/85036(DRP))

Areas Discussed: Management meeting to discuss recent problems with implementation of the preoperational testing program and the status and results of operator licensing examinations. The meeting involved a total of 28 inspector-hours by 14 NRC inspectors and regional staff.

Results: Significant concerns were discussed in the area of test procedure adequacy, test conduct and commitment implementation. It also was discussed that the applicant's projected fuel date may be affected if the negative preoperational testing performance trend continued. No items of noncompliance were identified during the meeting.

DETAILS

1. Persons Contacted

The following persons participated in the management meeting on June 3, 1985, at the NRC Region III Office in Glen Ellyn, IL.

a. Cleveland Electric Illuminating Company

R. M. Ginn, Chairman of the Board and Chief Executive Officer
H. L. Williams, Executive Vice President
M. R. Edelman, Vice President, Nuclear Group
M. D. Lyster, Manager, Perry Plant Operations Department
C. M. Shuster, Manager, Nuclear Quality Assurance Department
G. R. Leidich, General Supervising Engineer, Nuclear Test Section

b. Nuclear Regulatory Commission

J. G. Keppler, Administrator, Region III (RIII)
A. B. Davis, Deputy Administrator, RIII
C. E. Norelius, Director, Division of Reactor Projects (DRP), RIII
R. F. Warnick, Chief, Projects Branch 1 (PB1), DRP
R. C. Knop, Chief, Projects Section 1C (PS1C) PB1
J. A. Grobe, Senior Resident Operations Inspector - Perry, PS1C
J. F. Streeter, Technical Assistant, Division of Reactor Safety (DRS), RIII
L. A. Reyes, Chief, Operations Branch (OB), DRS
J. I. McMillen, Chief, Operator Licensing Section, OB
M. A. Ring, Chief, Test Programs Section (TPS), Engineering Branch
R. D. Lanksbury, Lead Test Inspector - Perry, TPS
D. E. Hills, Inspector, TPS
G. F. O'Dwyer, Inspector, TPS
J. J. Stefano, Licensing Project Manager, Division of Licensing, Office of Nuclear Reactor Regulation

2. Management Meeting

Mr. J. G. Keppler opened the meeting (Attachment 1) with a brief discussion of the problem areas in implementation of the preoperational test program and indicated that the applicant's projected fuel loading date may be affected if the negative preoperational testing performance trend continued. Following this introduction, Mr. R. C. Knop provided an overview of the status of facility completion and NRC inspection program completion in each functional area of the physical plant and the operations, technical, and quality assurance departments. Mr. Knop concluded his remarks with a discussion of the status of open item closeout noting that a significant workload exists for the applicant to prepare items for NRC closeout with approximately 250 items outstanding.

A detailed discussion of preoperational testing program implementation deficiencies was then presented by Mr. M. A. Ring (Attachment 2). Significant concerns were presented in the area of test procedure adequacy, test conduct and commitment implementation. Messrs. J. F. Streeter and L. A. Reyes then presented a synopsis of the poorer than desirable operator licensing examination results (Attachment 3) and indicated that the number of licensed operators was sufficient to operate the plant but was less than the average number of licensed operators at other Region III NTOLs.

The applicant responded to these presentations and discussed their corrective actions. Mr. G. R. Leidich presented corrective actions responding to the deficiencies in implementation of the preoperational testing program (Attachment 4). The applicant committed to better define the review responsibilities of each Test Program Review Committee (TPRC) member to ensure adequate review. The applicant also committed to add another level of detailed review of each procedure as defined in a Special Project Plan. Mr. M. D. Lyster presented a results evaluation and discussed program improvements regarding success rate for license candidates (Attachment 5).

NRC Region III was satisfied that the applicant had addressed the major programmatic areas needing attention. The inspectors will continue to evaluate progress in these areas during future inspections. No additional items of noncompliance were identified during this meeting.

PERRY MANAGEMENT MEETING

REGION III

JUNE 3, 1985

INTRODUCTORY REMARKS. KEPPLER

STATUS OF INSPECTION PROGRAM. KNOP

PREOPERATIONAL TESTING. LANKSBURY/RING

OPERATOR LICENSING. STREETER

CLOSING REMARKS. KEPPLER

PREOPERATIONAL TESTING PERFORMANCE

°ENFORCEMENT ACTIONS:

11 VIOLATIONS IDENTIFIED IN 5 INSPECTIONS
(7 OF THE VIOLATIONS IDENTIFIED IN LAST 2 INSPECTIONS)

°INSPECTION OBSERVATIONS:

- EXCESSIVE NUMBER OF VIOLATIONS
- VIOLATION RATE TREND NEGATIVE
- PRIMARY PROBLEM INADEQUATE PROCEDURES
- MISLEADING STATEMENTS/COMMITMENTS
- INADEQUATE CORRECTIVE ACTIONS
- UNTIMELY CORRECTIVE ACTIONS
- OBSERVATIONS SIMILAR TO THOSE IDENTIFIED AT OTHER PAST CATEGORY 3
PERFORMERS WHOSE SCHEDULES WERE ADVERSELY IMPACTED BY POOR
PREOPERATIONAL TESTING PERFORMANCE

°CONCLUSION:

PERFORMANCE SALP CATEGORY 3. PREOPERATIONAL TESTING CONCERNS PREVIOUSLY
DISCUSSED IN MANAGEMENT MEETING WITH M. EDELMAN. RIII LACKS CONFIDENCE
IN QUALITY OF TEST PROGRAM. IMMEDIATE MANAGEMENT ATTENTION NEEDED TO
ADDRESS ADEQUACY OF PROCEDURES, TIMELINESS AND ADEQUACY OF CORRECTIVE
ACTIONS, ADEQUACY OF TEST CONDUCT, AND MISLEADING NATURE OF STATEMENTS/
COMMITMENTS.

EXAMPLES OF INADEQUATE PROCEDURES

(9 OF THE 15 PROCEDURES REVIEWED THUS FAR BY THE NRC WERE DEFICIENT)

° STANDBY LIQUID CONTROL

- 1) BORON STORAGE TANK MIXING BY AIR SPARGER NOT TESTED ADEQUATELY.
- 2) ORIFICE FLOW NOT TESTED UNDER PROPER CONDITIONS.
- 3) DESIGN REQUIREMENT OF 10CFR50.62 NOT PROVEN.

° INSTRUMENT AIR

- 1) SYSTEM LEAKAGE PER REGULATORY GUIDE 1.80 NOT TESTED.
- 2) PRESSURE DROP NOT TESTED OVER SUFFICIENT TIME.

° RECIRC FLOW CONTROL

- 1) LOSS OF POWER TO HYDRAULIC CONTROL UNIT NOT TESTED
- 2) AUTO TRANSFER OF POWER TRAINS FOR HYDRAULIC POWER UNIT NOT TESTED

° ANNULUS GAS TREATMENT

- 1) WRONG STANDARD USED
- 2) SYSTEM RESTORATION MISSING

EXAMPLES OF INADEQUATE TEST CONDUCT

- ° COORDINATION/COMMUNICATIONS BETWEEN TEST AND OPERATIONS PERSONNEL
OPERATING DG AND LPCS

- ° USE OF TEMPORARY OPERATING INSTRUCTIONS
 - 1) LED TO INADVERTANT SPRAYDOWN OF CONTAINMENT

 - 2) LED TO OVERPRESSURIZATION OF EDG ESW HEAT EXCHANGER

- ° NOT USING SYSTEM OPERATING INSTRUCTIONS
 - 1) INCONSISTENT WITH REGULATORY GUIDE 1.68 COMMITMENT

 - 2) BASED ON PHILISOPHY THAT "TOIs ARE BETTER"

EXAMPLES OF MISLEADING STATEMENTS/COMMITMENTS

- ° COMMITMENTS TO REGULATORY GUIDES IN SECTION 1.8 OF FSAR
- ° CHANGING TPM TO CLOSE NRC ITEM THEN DELETING THE CHANGE
- ° COMMITMENT FOR MANAGEMENT PROCEDURE REVIEW TEAM TO
"REVIEW TEST PROCEDURES FOR ADEQUACY"

OPERATOR LICENSING PERFORMANCE

°EXAMINATION RESULTS:

<u>GROUP</u>	<u>NO. CANDIDATES</u>	<u>NO. PASSES (PASS RATE)</u>
FIRST	26	20(77%)
SECOND	<u>26</u>	<u>15</u> (58%)
TOTAL	52	35(67%)

°OBSERVATIONS:

- PASS RATE TREND NEGATIVE
- NO UNUSUAL PATTERN IN FAILURE CAUSES
- OVERALL PASS RATE (67%) IN LOWER END OF SPECTRUM FOR RIII NTOLS
- NUMBER OF LICENSES (35) ADEQUATE BUT LESS THAN OTHER RIII NTOLS

°CONCLUSION:

PERFORMANCE BORDERLINE BETWEEN SALP CATEGORY 2 AND 3. IMMEDIATE MANAGEMENT ATTENTION NEEDED TO DETERMINE AND CORRECT CAUSES OF LESS THAN DESIRABLE EXAMINATION PASS RATE.

PREOPERATIONAL TEST PROGRAMTesting Status (5/31)

Preoperational Tests	59 complete out of 106	(56%)
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Acceptance Tests	105 complete out of 116	(91%)
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overall	164/222	(74%)
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TEST PROCEDURES - CONTENT

- Original sample of five procedures and resulting comments
- Formation of Management Procedure Review Team (MPRT)
 - Improved confidence at Release for Test
 - Management approach
 - MPRT Recommendations

Test Procedures - Current Enhancements

- Increased management attention /Special Project Plan
- Test Program Review Committee (TPRC)
 - clarify review scope
 - add Licensing to TPRC
 - train review groups
- Improve Lead Test Engineer overview

Supervisor to Engineer ratio

Test Procedures - Current Enhancements

- Continue MPRT interface with System Test Engineers
 - at Release for Test
 - at Test Results - test objectives
 - ongoing training/Lessons Learned
- Enhance Review at Test Results
 - TPRC reviewers focus on procedures/processes/
methodology/commitments/tech specs
- Retrofit Program
 - MPRT to train select review group to review
all completed tests for:
 - Procedures
 - Processes
 - Methodology
 - Commitments
 - Tech Specs

Test Procedures - Sequence of Testing

- Test Program has been modified to require specific sequence detail in procedures
- Tests in Progress have been reviewed/modified to ensure level of detail is consistent
- The procedure backfit program will include review of sequence performed for completed tests

Timeliness of Corrective Actions - Test Program

- Organizational changes within NTS Administration
- Implementation of Perry Operations Procedures 1601,
NRC Interface During Plant Operations
- Reinforced within NTS
 - timely communications
 - adequate identification
 - prompt/complete resolution

Timeliness of Corrective Actions - Test Program

Data as of May 10 Exit Meeting:

	<u>Total Pending</u>	<u>Ready for Review</u>
Items of Noncompliance	13	1
Unresolved Items	10	0
Open Item	26	1
Total	<u>49</u> (11 tracking)*	<u>2</u>

Data as of May 31:

	<u>Total Pending</u>	<u>Ready for Review</u>
Items of Noncompliance	12	3
Unresolved Items	8	3
Open Items	52	12
Total	<u>72</u> (34 Tracking)*	<u>18</u>

*Tracking means that the NRC is waiting for an activity to be performed or condition to be attained before inspection or closeout.

Coordination/Communication between Nuclear Test Section
and Operations Section

Enhancements

- Shift Supervisors
 - in charge of plant testing and ops
 - dual reporting to test and ops
 - trained to Test Program Manual
 - function as Test Coordinator
- Operations chairs Test Plan of Day Meeting
- Transition of personnel test + ops
- Transition of Test Program to Operations Phase
 - e.g. Alarm Reponse Instruction
 - Tagging
 - M & TE Calibration Procedures
- Performance of Surveillance Instructions under Test Program
 - e.g. Local Leak Rate Testing
 - I & C
- Operations Planning Group in place

Use of System Operating Instructions (SOI's) During Testing

- Generally Temporary Operating Instructions (TOI's) have been used during testing
- Upgraded TOI program to integrate TOI's with operations (shift supervisor approval)
- Used SOI's in simulator training - high confidence from control room
- Issued directive to justify use of TOI's, otherwise use SOI's
- Comments resolution - joint NTS/ops action

US NRC MEETING6-3-85Chicago, IllinoisExamination Results

Total Exams = 42
 SRO Licenses = 25 of 32 = 78%
 RO Licenses = 6 of 10 = 60%

INPO 1984 Survey

	<u>SRO</u>	<u>RO</u>
NTOL (14 locations)	75.7%	61.1%
All Plants (62 locations)	81.6%	74.5%

Group Results

83-1 = 21/27 = 77%
 84-1 = 13/21 = 62%

Assignment to Groups

March, 1983 - License Class 83-1 started 30 week program

October, 1983 - Simulator and written exams administered-
 walkthrough exams postponed.
 21 of 27 people passed both exams

September, 1984 - License Class 84-1 started 30 week program

December, 1984 - License Class 83-1 divided into 3 groups to
 complete an 8-10 week training program and
 receive oral exams.

Exam Schedule	February	7 people
	May	9 people
	April	5 people all of whom were upgrades or retakes from October, 1983 exams.
	February, 1985	7 persons completed walk-through exams and all 7 passed
	April, 1985	26 people completed written, simulator and walk-through exams

Results: 5 written failures (2 RO,
3 SRO)

1 walk-through failure (RO)

1 simulator failure (SRO)

4 double failures (1RO,
3 SRO)

May, 1985

9 people completed
walk-throughs and all
passed

Results Analysis

- All written exam section failures (< 70%) were on Procedures.
(Section 4 of RO and Section 7 of SRO)
- 3 RO written failures did not answer last question of
Section 4 which was on separate page
- None of the people retaking exam in April failed.

These were not considered especially significant nor were any other
programmatic results distinguishable.

Review of Program and Improvements

- Number 1 objective was to maximize on-shift time
to gain knowledge of Perry during testing phase.

Minimized program duration
Minimized number of participants
Will pay large dividends in future

- Have instituted a more formal structure to the in-plant
tours and observation.

Previous programs were very flexible due to varying
backgrounds of the individuals.

- Increased use of simulator will be realized since it is now
at Perry.
- More cumulative performance measures will be utilized in future
programs instead of the previous "module" approach.

Shift Staffing Requirements

- FSAR - 5 shift rotation
 - SER - 5 shift rotation + 2 extra licensed people
 - Each shift at least 2 SRO and 2 RO licenses
- With 22 Operations personnel licensed the SER requirement can be met.
- 7 staff personnel with SRO licenses to augment as necessary.
 - Generic letter 84-16 Operating Shift experience requirements will be met.
 - Shift experience may be augmented as necessary by plant staff personnel (4) with extensive BWR experience.

1985 License Plans

- License Program will start this month and complete in December with 8 operators and 4 staff.
- 10 reapplications will be processed on or before December.

Summary

- Exam results are not to our standards or satisfactions.
- Results suffered due to our emphasis placed on plant testing participation.
- Immediately implement some improvements in program.
- Enough licenses exist to adequately staff our shifts.
- Well-trained motivated staff capable of accomplishing mission.