

SEP 20 1985

Docket No. 50-352

Mr. Edward G. Bauer, Jr.  
Vice President and General Counsel  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania 19101

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON OPERATOR REQUALIFICATION  
TRAINING PROGRAM

Dear Mr. Bauer:

By letter dated April 12, 1985, the Philadelphia Electric Company submitted the Licensed Operator Requalification Training Program for the Limerick Generating Station. The NRC staff has reviewed the program and finds that additional information, as identified in the enclosure, is necessary to complete our review. Please indicate the expected date for your response to the requested information. A period of thirty to forty-five days would appear to be sufficient for development of your response.

Should you have any questions regarding this request please contact the Limerick Project Manager, Robert Martin.

Sincerely,

Original signed by:

Walter R. Butler, Chief  
Licensing Branch No. 2  
Division of Licensing

Enclosure: As stated

cc/w enclosure: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

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Sincerely,

A handwritten signature in cursive script that reads "Walter R. Butler".

Walter R. Butler, Chief  
Licensing Branch No. 2  
Division of Licensing

Enclosure: As stated

cc/w enclosure: See next page

Mr. Edward G. Bauer, Jr  
Philadelphia Electric Company

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Limerick Generating Station

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REQUEST FOR ADDITIONAL INFORMATION  
LIMERICK GENERATING STATION  
LICENSED OPERATOR REQUALIFICATION  
TRAINING PROGRAM

Introduction

By a letter dated April 12, 1985, the Philadelphia Electric Company submitted the Licensed Operator Requalification Training Program for Limerick Generating Station (LGS) for review. Although the program meets most of the requirements of 10 CFR 55 Appendix A, the March 28, 1980 letter from Harold Denton to ALL POWER REACTOR APPLICANTS AND LICENSEES, and NUREG-0737, some of the language in the program description needs clarification.

Licensee should note that the introductory paragraph of the program description appears to have words missing. The paragraph reads:

The Licensed Operator Requalification Program shall comply with the requirements of the LGS FSAR, ANSI 3.1-1978, NUREG 0737, LGS Technical Specification paragraph 6.4.1, and 10 CFR 55 Appendix A are used as required to enhance the quality of this training program. This requalification shall address the following areas:

This section would make more sense if a period were inserted after "Appendix A ," and "These documents," or other appropriate words were added before "are used as required."

Section A - Schedule

This section states that the program is for licensed and senior licensed operators. Both Enclosure 1 of the March 28, 1980 letter to ALL POWER REACTOR APPLICANTS AND LICENSEES and Item I.A.2.3 of NUREG-0737 require instructors to be enrolled in appropriate requalification programs to assure they are cognizant of current operating history, problems, and changes to procedures and administrative limitations. Licensee should clarify its intent with respect to instructors and their enrollment in the requalification program.

### Section B - Lecture Series

This section states that lectures may be deferred due to unexpected plant operations but shall be conducted as soon as practicable there after. However, there is no provision for makeup of lectures missed by individual trainees, e.g. attendance at another scheduled lecture or self-study and quiz. It would be appropriate to add this information to this section of the requalification program.

This portion of the program description further states that the method of determining required attendance at lectures shall be defined. Licensee should provide details about the method and criteria to be used for determining required attendance as well as about the personnel responsible for making such a determination.

For those lectures where attendance is not mandatory, licensee states that individuals may be exempt if they have demonstrated proficiency by achieving a grade of 80% in that topic on the previous annual written examination. This is a practice found in ANSI/ANS-3.1 1978, which licensee references in its program. This is not the ANSI standard presently endorsed by the NRC. In addition, the staff has found this can be a poor practice. It is possible to achieve a grade of 80% in a specific topic on the annual examination and still fail to answer a question on an important safety area. Will this individual then be exempt from lectures in that area? NRC staff has also found instances whereby individuals voluntarily attended lectures from which they were exempt and subsequently failed weekly quizzes. They were never given remediation or retests because they were not officially required to be in attendance.

If licensee continues the practice of exempting individuals based on scoring 80% on the previous annual written exam, that exemption should also be based on that individual's not having failed any one question based on an important system. In addition, if an individual voluntarily attends lectures from



which he or she has been exempt and subsequently fails quizzes or examinations, that individual should receive remediation and retesting in that topic.

Licensee should also consider the alternative of permitting exemptions based only on challenging and testing out of the current lecture.

#### Section D - Design, Procedure, and License Change Review

Licensee states that mandatory reading material is distributed on a "normal monthly basis." However, the turnaround time is 60 days. Licensee should clarify the reason for allowing so much time for reading this material.

#### Section F - Evaluation of Performance

According to 10 CFR 55, Appendix A, Part 4.c, requalification program evaluations shall include:

Systematic observation and evaluation of the performance and competency of licensed operators and senior operators by supervisors and/or training staff members including evaluation of actions taken or to be taken during actual or simulated abnormal and emergency conditions.

Licensee only mentions this type of performance under Section E - Procedure Review. This form of evaluation must be included in the requalification program; licensee must also specify that supervisors and/or training staff will evaluate the actions of individuals being examined.

The language with regard to evaluation on the simulator is unclear. Licensee states that evaluation is performed in the "use of the Limerick Training Center, or equivalent, Simulator as described under Reactor Control

Manipulations and Procedures Review Sections." Are license holders being evaluated on how to use the simulator or on their ability to perform control manipulations on that simulator? Licensee must also state that evaluations on abnormal and emergency operations shall be done by a member of the training staff at a minimum, as called for by Enclosure 1, Part C.3 of the March 28, 1980 letter from Harold Denton to ALL POWER REACTOR APPLICANTS AND LICENSEES.

This section of the program states that:

--- an operator who is evaluated at less than 80% on the overall examination or less than 70% in any section will be immediately scheduled for an oral examination to determine the necessity for removing that operator from licensed shift duties during the accelerated review.

Licensee should clarify its intent with respect to the words "immediately scheduled." This does not indicate when the operator will actually be examined. It would be preferable for licensee to state some finite period in which the operator will be examined to determine the need to remove him or her from licensed duties. Also, the operator should be removed from licensed duties until the determination by examination is made.

The program description also states only that operators whose overall performance on the Annual Oral Examination is unsatisfactory will be placed in a review program to correct deficiencies noted. Licensee should state what provisions are made for oral retesting of these operators.

Licensee does not state whether authors and reviewers of annual requalification examinations will be exempt from taking these examinations. Licensee should clarify its intent with respect to such exemptions and also provide details of how authors and reviewers will be periodically rotated.



This will ensure that the same license holders will not continually be exempt from taking examinations.

The last two paragraphs of this section of the requalification program reads as follows:

Licensed staff members will have a minimum of 16 hours of participation in control room operations over a four month period. This participation may include a senior supervisory function or actual reactor operations.

Any inactive licensee, who has less than 16 hours of participation or observation of control room operations over a four month period, shall be given an oral examination evaluation to demonstrate that his knowledge and understanding of the facility are satisfactory.

The term "participation in control room observations" is vague, especially when the paragraph states that this participation "may include a senior supervisory function or actual reactor operations." In addition, licensee's requirement for sixteen hours in a four-month period does not appear to be sufficient time to qualify as active performance. Current NRC policy defines "actively performing" as one shift per month or three shifts per quarter.

10 CFR 55.31(e) requires that a licensee actively perform the functions of an operator or senior operator. If a licensee has not fulfilled this requirement for four months or longer, he or she must demonstrate to the Commission that his/or her knowledge and understanding of the facility operation and administration are satisfactory. This must be certified to the Commission by an authorized representative of the facility licensee by which the individual licensee has been employed.

Licensee should include a paragraph about such certification following the paragraph about inactive licensees. In addition, licensee must define "participation in control room operations" more clearly and ensure that the modification meets the intent of 10 CFR 55.31(e).

#### Section G - Records

The last paragraph of this section states:

After an NRC-NRR audit, copies of audited individual examination answers may be destroyed.

This is inconsistent with the two-year retention requirement in 10 CFR 55 Appendix A, Part 5.a. Such examination answers cannot be destroyed unless they meet the two-year retention criterion.