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0031C

September 24, 1985

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz, Chief
Operating Reactors Branch No. 4
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2
LICENSED OPERATOR REQUALIFICATION TRAINING PROGRAM

Gentlemen:

Attachment 5 to NRC Examination Report 50-321/OL-84-01, dated November 23, 1984, provided a determination that the Plant Hatch Licensed Operator Requalification Program, in use at that time, was unsatisfactory. Subsequently, an interim accelerated requalification training program was conducted by Georgia Power Company (GPC) to resolve the identified deficiencies and increase the level of licensed operator proficiency. NRC Inspection Report 50-321/366 85-07, dated April 1, 1985, confirmed that a permanent NRC approved requalification program must be re-established at Plant Hatch for use following the completion of the interim accelerated training program in July, 1985. The Inspection Report states that NRC approval of this program is required by October 15, 1985, and will be tracked as Inspector Followup Item (321,366/85-07-9). This letter submits, for NPC approval and subsequent GPC incorporation into the Plant Hatch FSARs, the re-established License Requalification Program.

The Hatch FSAPs are written in accordance with the requirements of NRC Regulatory Guide 1.70. Section 13.2.2.1 of this Regulatory Guide specifies that a detailed description of the applicant's licensed operator requalification training program should be provided. This description should show how the program will implement the requirements of Appendix A to 10 CFR Part 55. Accordingly, the attached License Requalification Program follows the numerical format of 10 CFR 55 Appendix A. Each numbered section of the enclosure details the programs which will be used at Plant Hatch to implement the requirements contained in the corresponding section of Appendix A to 10 CFR 55. In addition, a discussion of applicability is provided as section 0.0.

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The attached License Requalification Program, which implements the requirements of 10 CFR 55 and applicable NUREGs, contains all pertinent commitments. Previous commitments made as a result of inspections, audits, etc. are considered superseded by the attached program.

The attached License Requalification Program will commence in October, 1985. Four training segments will comprise the first 12 month cycle. Segment examinations will be averaged during the fourth segment to determine the overall written evaluation.

A one time extension of seven months is requested from the annual written examination evaluation requirements of 10 CFR 55 Appendix A, Item 4.a., for affected individuals, to allow for transition to the new program.

Please contact this office if you desire further information.

Very truly yours,



L. T. Gucwa

REB/

Enclosure

xc: Mr. J. T. Beckham, Jr.
Mr. H. C. Nix, Jr.
Dr. J. N. Grace (NRC-RII)
Senior Resident Inspector, Plant Hatch

ATTACHMENT 1

LICENSE REQUALIFICATION PROGRAM

- 0.0 Applicability The program applies to all NRC licensed reactor operators and senior operators in the plant organization including licensed staff members.
- 0.1 Individuals who maintain operator or senior operator licenses for the purpose of providing backup capability to the operating staff shall participate in the program except to the extent that their normal duties preclude the need for specific retraining in particular areas.
- 0.2 Newly licensed individuals shall be enrolled in this program beginning with the subsequent training segment. An individual receiving his license within six months of the annual simulator and/or oral examination is exempted from taking this exam.
- 0.3 Reactor operators enrolled in a Senior Reactor Operator upgrade program may be exempt from the requirements of this procedure while so enrolled. However, if the individual does not obtain an SRO license, he will pass a simulator and comprehensive written examination and meet the requirements of Section 3.2.2.2 prior to resuming licensed duties as a reactor operator.
- 1.0 Schedule The program will run continuously on an annual basis during a two year cycle.
- 2.0 Lectures A planned lecture series is presented annually covering those subjects where annual written examinations indicate a need for additional training. The lecture series is based on the following subjects:
- a. Theory and principles of operation.
 - b. General and specific plant operating characteristics.
 - c. Plant Instrumentation and control systems.
 - d. Plant protection systems.
 - e. Engineered safety systems.
 - f. Normal, abnormal, and emergency operating procedures.
 - g. Radiation control and safety.
 - h. Technical specifications.
 - i. Applicable portions of Title 10, Chapter I, Code of Federal Regulations.

(2.0 continued)

- j. Quality assurance for operations.
- k. Major upcoming events (necessary personnel only).
- l. Heat transfer, fluid flow, and thermodynamics.
- m. Mitigation of accidents involving a degraded core.

The lecture series is presented primarily by Plant Hatch personnel with the use of training aids, including films and videotapes, not to exceed 50 percent of the total lectures. A minimum of 80 hours per year will be scheduled for the lecture series.

3.0 On-The-Job Training

- 3.1 Reactivity Controls Each licensed operator manipulates the plant controls and each licensed senior operator either manipulates the controls, or directs the activities of individuals during plant control manipulations, during the term of their licenses. For reactor operators and senior operators, these manipulations shall consist of at least 10 reactivity control manipulations in any combination of reactor startups, reactor shutdowns, or other control manipulations which demonstrate skill and/or familiarity with reactivity control system.

The following control manipulations and plant evolutions are acceptable for meeting the reactivity control manipulations required by Appendix A, Paragraph 3.a of 10 CFR Part 55. The starred items shall be performed on an annual basis; all other items shall be performed over a two year cycle. Each individual shall perform or participate in a combination of reactivity control manipulations based on the availability of plant equipment on a plant specific simulator. Whenever they are, the use of Plant Hatch Technical Specifications will be maximized during the manipulations. Personnel with senior licenses are credited with these activities if they direct or evaluate control manipulations as they are performed.

- * 0 Plant or reactor startups to include a range that reactivity feedback from nuclear heat addition is noticeable and heatup rate is established.
- 0 Plant shutdown.
- * 0 Manual control of feedwater during startup and shutdown.
- * 0 Any significant (10 percent) power changes in manual rod control or recirculation flow.
- * 0 Loss of coolant including:
 - Inside and outside primary containment.
 - Large and small, including leak-rate determination.

- 0 Loss of instrument air (if simulated plant specific).
- 0 Loss of electrical power (and/or degraded power sources).
- * 0 Loss of core coolant flow/natural circulation.
- 0 Loss of condenser vacuum.
- 0 Loss of service water.
- 0 Loss of shutdown cooling.
- 0 Loss of component cooling system or cooling to an individual component.
- * 0 Loss of normal feedwater or normal feedwater system failure.
- 0 Loss of all feedwater (normal and emergency).
- 0 Loss of protective system channel.
- 0 Mispositioned control rod or rods (or rod drops).
- 0 Inability to drive control rods.
- 0 Conditions requiring use of standby liquid control systems.
- 0 Fuel cladding failure or high activity in reactor coolant or off-gas.
- 0 Turbine or generator trip.
- 0 Malfunction of automatic control system(s) which affect reactivity.
- 0 Malfunction of reactor coolant pressure/volume control system.
- 0 Reactor trip.
- 0 Main steam line break (inside or outside containment).
- 0 Nuclear instrumentation failure(s).

3.2 Knowledge of Systems

Each licensed reactor operator or senior reactor operator is required to demonstrate, in the performance of his duties, his satisfactory understanding of the operation of systems and apparatuses and his knowledge of operating procedures in each area for which he is licensed.

3.2.1 Active Status

To remain on active status for the purpose of performing licensed duties, a reactor operator or senior operator must:

- 0 Participate in the License Requalification Program, and
- 0 Notify the training Department in writing that he has performed licensed duties for forty hours during the preceding four months.

License duties shall be considered to be those duties performed on shift by Operations Supervisors, Shift Supervisors, Plant Operators, and Assistant Plant Operators, duties involving fuel handling, and duties involving on-site line responsibility for directing day-to-day control room activities.

3.2.2 Inactive Status

3.2.2.1 Any individual who fails to notify the Training Department of active license activities as defined in Section 3.2.1 or who is removed from license duties as required elsewhere in the requalification program shall be designated as inactive. This will be documented with written notification to the individual and to the appropriate Department Manager. Inactive license maintenance will require participation in the license requalification program.

3.2.2.2 Any licensed reactor operator or senior reactor operator who has been inactive for four or more months, before resuming licensed duties, is required to demonstrate adequate knowledge of current plant operations. This demonstration shall be certified to the NRC, and NRC concurrence obtained prior to the individual resuming license duties. This is accomplished by a review of all applicable plant and procedure changes during the period the operator was inactive followed by an evaluation by either the Manager-Operations, Deputy General Manager, or General Manager-Plant Hatch. A comprehensive written, simulator, and oral examination may be submitted for this evaluation. An unsatisfactory result on the evaluation requires the operator to have On-The-Job training in areas determined as weak until either the Manager-Operations, Deputy General Manager, or General Manager-Plant Hatch is satisfied that he has adequate knowledge of current operations.

3.3. Plant Changes

Each reactor operator and senior reactor operator is kept informed of all plant design changes, procedure changes, and license changes. This is accomplished by written notice of these changes to each holder of an operator or senior operator license. Changes of a magnitude requiring detailed explanation are reviewed by lecture with 100 percent attendance of licensed personnel.

3.4 Procedure Reviews

Each licensed operator and senior operator reviews the contents of all applicable abnormal and emergency procedures on an annual basis as scheduled in the requalification program. A delinquency of 30 days on a procedure review cycle requires that the licensee shall be removed from license duties until such a review is complete.

4.0 Evaluation

4.1 Annual Diagnostic Examinations

Annual written diagnostic examinations which serve to determine areas in which retraining is needed to upgrade licensed operator and senior operator knowledge will be administered to all licensed operators and senior operators. Since these examinations are diagnostic, no minimum passing grade will be established. However, individual scores less than 70 percent of the average score will require the individual to be removed from license duties until he attends accelerated retraining and passes a simulator and/or oral examination.

4.2 Written Evaluations

Written examinations which determine licensed operator's and senior operator's knowledge of subjects covered in the requalification program and provide a basis for evaluating their knowledge of abnormal and emergency procedures will be administered on a segmented basis. Scores on the segment examinations administered during an annual cycle will be averaged to determine an overall annual examination score. Individual segment scores of less than 70 percent or overall scores of less than 80 percent will require that an individual be removed from license duties and be enrolled in an accelerated requalification program. If an individual is administered a segment re-examination, the new score may be used in determining the final overall score. These examinations may be prepared and evaluated normally within 30 days (2 months for unusual conditions with corporate office approval) by either Plant Hatch personnel or an outside agency.

4.3 Observation and Evaluation Systematic observation and evaluation of the performance and competency of licensed operators and senior operators by supervisors and/or training staff members will be accomplished by observation during periodic simulator training and an annual simulator and/or oral operating examination. The annual simulator and/or oral operating examination will include an evaluation of actions taken during actual or simulator abnormal and emergency conditions. A plant specific simulator examination will be the primary means of conducting this evaluation. However, this does not preclude the observation and evaluation of the performance of licensed duties by operating supervision. An unsatisfactory observation or annual operating evaluation will require that the individual be removed from license duties and enrolled in an accelerated requalification program.

- 4.4 Accelerated Requalification Program Unsatisfactory performance as determined in Sections 4.1 through 4.3 shall require that the individual be removed from licensed duties and enrolled in an accelerated requalification program. This program shall be based on identified areas of weakness. Unsatisfactory performance as defined in Section 4.1 and 4.3 shall require passing of a simulator and/or oral examination for successful completion. Unsatisfactory performance as described in Section 4.2 shall require achieving a score of at least 80 percent on a written examination for successful completion. If the reasons for unsatisfactory performance was an overall average of less than 80 percent on the segmented annual examination, successful completion will require a score of 80 percent overall and 70 percent per section on a comprehensive examination. Acceptable accelerated lectures require a minimum of two instructor contact hours for each segment or section below 70%. Acceptable re-examinations require a minimum of three questions for each section or segment below 70%.
- 4.5 Nuclear Regulatory Commission Requalification Program Evaluation
- The segment of training prior to a Requalification Program Evaluation may consist of a preparation period. When the evaluation is not scheduled sufficiently in advance of the segment, previously scheduled topics for that segment may be deferred until after the evaluation.
- 5.0 Records The following records are required to be maintained to document the participation of each licensed and senior operator in the requalification program.
- 5.1 Lesson plans.
- 5.2 Program File:
- a. Master/key of all written examinations.
 - b. Summary of exam results.
 - c. Curriculum.
 - d. Attendance Records.
- 5.3 Distribution cover sheets of design, procedure and license changes.
- 5.4 Individual files:
- a. Examination answers/results.
 - b. Results of all evaluations
 - c. Observation results.
 - d. Reactivity control manipulations.
 - e. Accelerated Requalification attendance.
 - f. Documentation related to individual's license status.