



# 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

October 29, 1985  
PY-CEI/NRR-0382 L

Mr. B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Perry Nuclear Power Plant  
Docket Nos. 50-440; 50-441  
Operator Training and  
Requalification

Dear Mr. Youngblood:

The Cleveland Electric Illuminating Company has submitted our Licensed Operator Requalification Program to the NRC for review in FSAR Chapter 13 and in letters dated April 22, 1985, (PY-CEI/NRR-0231L), August 22, 1985 (PY-CEI/NRR-0312L), and September 30, 1985 (PY-CEI/NRR-0361L). This program was developed to satisfy the requirements of 10CFR55 Appendix A to maintain and improve licensed operator skills and knowledge in order to better assure safe and reliable plant operation over the life of the plant. 10CFR55 requirements and the requalification program recognize that the normally stable plant conditions surrounding commercial power plant operation require operators to study abnormal conditions and perform stimulated exercises in order to maintain high skill levels, due to the lack of abnormal plant conditions during normal power operation.

The Perry Nuclear Power Plant is preparing to enter a significant and unique period in its' operating history, that of initial criticality, low power operation and plant startup testing. Tests, evolutions and activities will occur during this period that are not likely to be repeated during the remainder of the plants' operating lifetime. The people who conduct and administer these activities will receive valuable and irreplaceable experience. The NRC has acknowledged the benefit of operator participation in this phase of the Perry Nuclear Power Plant Startup Program through the requirements of NUREG-0737, Section I.G.1.

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Mr. B. J. Youngblood

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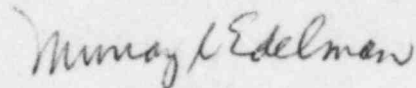
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CEI believes that activities occurring during the low power operation and startup testing phases involve the abnormal conditions and exercises that the NRC endorses as highly advantageous to the licensed operators, and which the requalification program addresses. CEI intends to optimize the advantages of this unique period by placing the operators on a four shift rotation, maximizing their exposure to the low power testing and startup activities. The lecture and evaluation portions of this formal requalification program will be suspended during this time, to be reinstated following completion of the startup test phase. This approach will achieve the maximum benefit of the startup phase experience while meeting the intent of the NRC requirements regarding licensed operator training and requalification.

On-shift activities will be monitored and appropriate documentation of experience will be entered and maintained in the requalification training files during this period. The four shift rotation will commence shortly after fuel load, following the completion of the immediate training needs which have been incorporated into the current requalification cycle.

Please feel free to contact me should you have any further questions.

Very truly yours,



Murray R. Edelman  
Vice President  
Nuclear Group

MRE:njc

cc: Jay Silberg, Esq,  
John Stefano (2)  
J. Grobe