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MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

August 22, 1985
PY-CEI/NRR-0312 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
Perry Licensed Operator
Requalification Program

Dear Mr. Youngblood:

Your letter dated June 25, 1985 requested additional information pertaining to our Licensed Operator Requalification Program. Our response is attached.

Please feel free to contact me if you have any questions or comments concerning this submittal.

Very truly yours,

Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

Attachment

cc: Jay Silberg, Esq.
John Stefano (2)
J. Grobe
D. Beckham
J. I. McMillen

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Question

1. Number 1 of your description of licensed duties allows an individual to assist RO's or SRO's in the performance of their duties. Appendix A of 10 CFR Part 55 under #3 of the Requalification Program Requirements states that individuals must manipulate (RO) or direct (SRO) the activities of individuals during plant control manipulations. Explain the responsibilities and under what circumstances individuals would fall into the category of providing assistance.

Response

1. "Assist" as referred to in Number 1 of Licensed Duties applies only to those SRO's who are not regularly assigned shift supervisory responsibilities. These individuals will function as an "extra man on-shift", and will work in coordination with the regular shift team. On-shift time is used to maintain the licensed individual's familiarity with shift practices and plant status. Required reactivity manipulations, while not overlooked during on-shift assignments, will be accomplished on the PNPP simulator.

Question

2. During a two-year requalification program, you anticipate that under some circumstances which are unavoidable the Requalification Program would be suspended for up to 16 weeks. It is recognized that there are situations which may arise causing delays in the Requalification Program. However, in the interest of keeping the program on a two-year cycle, requests for suspension up to 16 weeks will be made on a case-by-case basis.

Response

2. The paragraph from the original submittal will be modified as follows:

"The Requalification Program may be suspended for up to sixteen (16) weeks during the two (2) year requalification program, to assure adequate shift coverage during unavoidable circumstances such as major plant outages. The General Supervisor - Perry Training Section will notify the NRC of the circumstances requiring a suspension, the suspension schedule, and the impact on the two year requalification cycle prior to effecting the suspension."

Question

3. Discuss the requalification of the training instructors and the requalification program administered to the instructors in order to have them remain certified as instructors as specified in Enclosure 1 of H. R. Denton's March 28, 1980, letter to all power reactor applicants and Item I.A.2.3 of NUREG-0737.

Response

3. NRC Licensed Training Instructors will be enrolled in a continuing requalification program. Instructors will be required to participate at the same level and intensity as licensed operators. Exception will be made only for the instructor(s) responsible for development of requalification examinations. These instructors will be exempted from taking the examination.

Question

4. Discuss the certification completed pursuant to Section 55.33(a) (4) and (5) of 10 CFR Part 55. Provide the title of the individual who will certify the eligibility of individuals for renewal of license. (Ref. Enclosure 1 of H. R. Denton's March 28, 1980 letter, Section A.3).

Response

4. Certification of eligibility shall be made on NRC Form 398, signed by the General Supervisor, Perry Training Section and the Vice President - Nuclear Group, as required by 10CFR55.

Question

5. The criteria for accelerated training in your program meets neither the intent of the commissioner's position nor current industry standards. Accelerated training should be provided on a timely basis in the area(s) where licensed personnel exhibit deficiencies. We therefore, request you modify your program to state that licensed personnel will be suspended from licensed duties when:
- a) Overall grade on the annual written examination is less than 80% overall and less than 70% in a category.
 - b) Annual oral examinations or evaluations made by supervisors and/or training staff members of the performance and competency of licensed personnel during actual or simulated abnormal and emergency conditions clearly indicate the need for accelerated training.

Waiver of suspension from licensed duties will be considered if the Station Superintendent develops an Operations and Training Review Board that comprises members of the station senior staff members. The Board should review the licensed individual's past performance, evaluate deficiencies and recommend a training program before waiving suspension of licensed duties. The evaluation shall be completed within seven working days of the original findings. Accelerated training and reexamination must be completed within 30 days of the Board's recommendations.

Response

5. Overall grade on the annual examination of less than 80%, or a category score of less than 70% will result in the immediate removal of licensed responsibilities from the licensed individual. A management review of the individuals past operating performance, simulator performance and training history shall be conducted prior to initiation of accelerated training or a waiver from suspension.

A waiver from suspension may be requested by the General Supervisor - Operations for a period of 30 days. The request will state the justification for waiver, and will be submitted to the Vice President - Nuclear Group for Approval. The Vice President - Nuclear Group shall gather information from Training, Operations or other functions as necessary prior to authorizing a waiver. The NRC will be notified of any suspensions from licensed activities and/or waivers. In the event of a waiver, accelerated training and reexamination shall be completed within 30 days of the waiver date.

Question

6. Item 70, Fundamental Review Lecture Series, indicates that topics to be included are selected on an as-needed basis. Item I.A.2.1.(C)(1) of NUREG-0737, however, requires the content of the operator requalification program to include instruction on heat transfer, fluid flow, thermodynamics and mitigation of accidents involving a degraded core. Are there circumstances under which these topics would not be provided on an annual basis? Also, provide details of the mitigating core damage training program.

Response

6. Instruction on heat transfer, fluid flow, thermodynamics and mitigation of accidents involving a degraded core will be taught on an annual basis. All other subjects in the fundamental review lecture series will be taught on an as-needed basis determined by reviewing deficiencies noted in requalification examinations.

The PNPP Mitigation of Core Damage course description (shown below) is part of the initial training program for NRC license candidates. The course content will be reviewed for revision on an annual basis for purposes of requalification training.

<u>DESCRIPTION</u>	<u>MITIGATION OF CORE DAMAGE TRAINING</u>
Objective	To develop a familiarization of the use of installed plant systems to control and mitigate an accident in which the core is severely damaged.
Content	Approximately 20 hours formal lecture (01) on the generic effects and conditions expected during a severe accident, 20 hours of formal (02) lecture on Perry procedures to recognize the extent of, and mitigate core damage, and 40 hours of structured control room simulator (03) instruction in the actual use of Perry procedures during accident situations.
Minimum Performance Criteria	Attendance and examinations administered to judge trainee progress.
Requalification Periodicity	As provided in license requalification program.

Question

7. Discuss record retention requirements to be met in fulfilling 10 CFR Part 55, Appendix A, Requalification Program Requirements, Section 5.

Response

7. Copies of all written examinations administered, and answers to the examinations will be maintained.

A record of individual participation in preplanned lecture series, seminars, on-the-job training, accelerated requalification program, reactivity manipulations and simulator training will be maintained. These records will include dates, duration and a general description of each event. In addition, a record of review of procedures, procedure changes, facility design changes, and facility license changes will be maintained. The above records will be retained for at least two years.