

February 7, 1986

MEMORANDUM FOR: John F. Stolz, Chief
Operating Reactor Branch #4
Division of Licensing

FROM: Caudle A. Julian, Chief
Operations Branch
Division of Reactor Safety

SUBJECT: E. I. HATCH REQUALIFICATION TRAINING PROGRAM

We have reviewed the Hatch Requalification Program submitted by Georgia Power Company in letters dated September 24 and December 17, 1985.

Enclosed are our comments and concerns with respect to the program. We have provided recommendations to assist you in your review; hopefully, they will be of help in defining Hatch's final program

If you need any further information or assistance, please contact Mr. Ken Brockman (FTS/242-2694) of this office.

(Original signed by C.A. Julian)

Caudle A. Julian

Enclosure: As stated

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ENCLOSURE 1

SPECIFIC COMMENTS

Paragraph 0.0

The utility NOTE requires all vendor instructors to be enrolled in an approved vendor requalification program. Has NRR approved the vendor requalification programs? If not, this should be revised to an "appropriate vendor requalification program."

Paragraph 0.1

Reword the paragraph to:

"All individuals who maintain operator or senior operator licenses for the purpose of providing backup capability to the operating staff shall participate in the program."

The paragraph on waivers addresses the criteria for exempting personnel; the caveats of paragraph 0.1 are irrelevant.

Paragraph 0.1.1

Add the additional criteria that only one segment per year per individual may be waived for preparing/grading an exam. (Bullet #2)

The waiver criteria for segment performance evaluations (Bullet #3) appears to conflict with paragraph 3.1. Can half, or all, of the reactivity manipulations be credited by evaluating others' performance? Either criteria is acceptable, but consistency is necessary.

Paragraph 3.1

See 0.1.1, above

Paragraph 3.2.2.2

Remediation for an unsatisfactory result on the evaluation should necessitate formal testing (written or oral) as appropriate for the weakness. This would assist the Manager-Operations, et al, in ascertaining that the operator has adequate knowledge.

Paragraph 4.1 and 4.2

The concept presented here is aggressive and idealistically, has merit. NRR must assure itself that the philosophy espoused does not violate 10 CFR 55, Appendix A.4.a and b. As written, if all individuals scored between 60% and 70% on the diagnostic exam, which is the only composite annual exam given, there would be no requirement for the utility to take any actions concerning the immediate operating competency of their personnel.

The implications of this approval with respect to I&E Inspections is tremendous. As a minimum, we see that the approval should emphasize the requirement that the annual exam be of a difficulty level such that failing scores can be justified as reflecting diagnostic trends and not reflect less than minimal competence in the operating staff. The utility is still responsible to initiate remedial action for those personnel who demonstrate their knowledge to be less than the minimal requirements. The approval letter must emphasize this point.

Paragraph 4.3

Simulator evaluations should only be allowed to be "postponed" until such time as the simulator is again available.