

**Florida  
Power**  
CORPORATION

October 1, 1985  
3F1085-01

Director of Nuclear Reactor Regulation  
Attention: Mr. Hugh L. Thompson, Jr., Director  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Crystal River Unit 3  
Docket No. 50-302  
Operating License No. DPR-72  
NUREG-0737, Item I.A.1.1  
Nuclear Operation Shift Technical Advisor (STA) Qualifications

Dear Sir:

Florida Power Corporation (FPC), with this letter, is revising its commitment regarding qualifications of individuals assigned to the STA position.

The following references are applicable to this issue and helpful in framing the requirements and the original commitment.

- (1) NRC's letter dated 9/13/79, D. G. Eisenhut to All Operating Nuclear Power Plants, paragraph (c) & Enclosure 2
- (2) NRC's letter dated 10/30/79, H. R. Denton to All Operating Nuclear Power Plants, (NUREG-0578, Section 2.2.1.b)
- (3) FPC's letter dated 2/11/80, P. Y. Baynard to H. R. Denton, (Item 2.2.1.b)
- (4) NRC's letter dated 5/5/80, R. W. Reid to J. A. Hancock, (Item 2.2.1.b)
- (5) NUREG-0737 (Item I.A.1.1) and Appendix C (INPO Document, Nuclear Power Plant Shift Technical Advisor; Recommendations for Position Description, Qualifications, Education and Training; Rev. 0, 4/30/80)
- (6) FPC's letter dated 12/15/80, P. Y. Baynard to D. G. Eisenhut, NUREG-0737, Item I.A.1.1
- (7) FPC's letter dated 12/31/80, P. Y. Baynard to D. G. Eisenhut, NUREG-0737, Item I.A.1.1
- (8) FPC's letter dated 1/30/81, P. Y. Baynard to D. G. Eisenhut, NUREG-0737, Item I.A.1.1
- (9) FPC's letter dated 10/15/82, P. Y. Baynard to D. G. Eisenhut, NUREG-0737, Item I.A.1.1
- (10) Crystal River Unit 3 Technical Specification 6.3.1

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Florida Power Corporation (FPC) is revising its commitment regarding the qualifications (selection, training, requalification) and duties of the Shift Technical Advisor (STA). References (3), (4), and (6) through (9) describe FPC's program for the implementation of the STA requirements of references (10) and (5) as stated below.

#### Technical Specification 6.3.1

"Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for . . .

. . . and the Operations Technical Advisor, who shall have a Bachelor's degree, or the equivalent, in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents."

#### NUREG-0737 I.A.1.1

"The STA shall have a bachelor's degree or equivalent in a scientific or engineering discipline and have received specific training in the response and analysis of the plant for transients and accidents. The STA shall also receive training in plant design and layout, including the capabilities of instrumentation and controls in the control room. The licensee shall assign normal duties to the STAs that pertain to the engineering aspects of assuring safe operations of the plant, including the review and evaluation of operating experience."

#### Selection

Past commitments ranged from an early response to NUREG-0578 which required a bachelor of science degree in engineering or equivalent with five years of Nuclear Power Plant experience, to the most recent response to NUREG-0737 which requires the STA to possess a bachelor of science degree with significant nuclear power experience.

FPC now revises its commitment. FPC will select individuals to perform STA duties who have bachelor's degrees in a scientific or engineering discipline with at least four years nuclear power experience. This commitment meets the requirements of NUREG-0737 and CR-3 Technical Specifications and does not adversely affect the level of safety at Crystal River Unit 3.

#### Training and Requalification

Early STA training program commitments consisted of Reactor Operator License training. Subsequent FPC program commitments consisted of a detailed implementation of INPO Guidelines for STA training or an FPC certification of successful completion of a Senior Operator Training program. Additionally, FPC stated that STAs will be requalified by participation in the SRO requalification program.

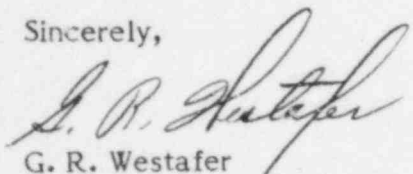
FPC now revises its commitment. FPC will provide training specified for STA's by NUREG-0737 and CR-3 Technical Specifications as stated herein. Furthermore, STA will maintain their qualification through successful completion of an STA requalification program which shall include those topics required for initial STA training. This commitment meets the requirements of NUREG-0737 and CR-3 Technical Specifications and does not adversely affect the level of safety of Crystal River Unit 3.

#### Duties

FPC does not revise any commitments relative to the on-shift activities of the STA. When assigned to the operating shift, the STA is responsible to the Shift Supervisor to provide remedial and technical advice that pertains to the engineering aspects of assuring safe operations of the plant, including the review and evaluation of operating experience. The on-shift STA will be on site at all times in a 24-hour shift rotation scheme and be available to report to the control room within ten minutes of being summoned by the Shift Supervisor.

However, early responses to NUREG-0578 in reference (4) stated that FPC will "... establish a separate organization to fulfill the functions of the STA." FPC no longer considers it necessary to limit STA qualifications to any one segment of its organization. Accordingly, FPC will now assign any qualified member of the plant staff to perform the STA duties as long as that person is not in the same reporting chain as the Shift Supervisor. Additionally, the review and evaluation of operating experiences will be performed by personnel with significant nuclear power plant experience and will not necessarily be restricted to personnel in one particular job classification or who possesses STA qualifications. These commitments regarding the review and evaluation of operating experience and STA assignment meet the requirements of NUREG-0737, but are not addressed by CR-3 Technical Specifications. The level of safety of Crystal River Unit 3 is not adversely affected.

Sincerely,



G. R. Westafer  
Manager, Nuclear Operations  
Licensing and Fuel Management

DEP/feb

cc: Dr. J. Nelson Grace  
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