

**Florida
Power**
CORPORATION

December 16, 1985
3F1285-09

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

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
NUREG-0737, Item II.B.4
Revision to Training for Mitigating Core Damage

Dear Sir:

Florida Power Corporation (FPC), with this letter, is providing the last component of a revised definition regarding training of personnel in mitigation of accidents involving a degraded core. The revisions here-in defined and described, together with clarifications transmitted by letters dated July 23, 1985 (References 1 and 2), form the total current commitment to provide appropriate instruction and training in the use of installed plant systems to control or mitigate an accident in which the core is severely damaged.

The following definition and description deals with the training of personnel where training program elements described by References 1 and 2 are not directly applicable, i.e., where personnel occupying the positions are not receiving the subject training via requirements of the Replacement Operator Training Program or the Licensed Operator Requalification Training Program. These positions include shift technical advisors and operating personnel from the plant managers through the operations chain; and managers and technicians in the instrument and control (I&C), health physics, and chemistry departments.

The following references are applicable to the issue and helpful in adding perspective to FPC's original statement of commitment, and support this commitment revision.

- 1) FPC's letter dated July 23, 1985 (Letter No. 3F0785-15), G. R. Westafer to H. L. Thompson, Jr., Licensed Operator Requalification Training Program Commitment Clarification.

8512190171 851216
PDR ADOCK 05000302
P PDR

A046
11

- 2) FPC's letter dated July 23, 1985 (Letter No. 3F0785-16), G. R. Westafer to H. L. Thompson, Jr., Replacement Operator Training (ROT) Program.
- 3) NUREG-0737, Item II.B.4 and its reference, Denton 3/28/80 letter, enclosure 3.
- 4) NRC Inspection Report 50-302/81-15, dated 9/24/81, paragraph 8.c.
- 5) FPC's letter dated 5/5/82, D. G. Mardis to J. F. Stolz, Question/Response Nos. 3 and 8.
- 6) FPC's letter dated 2/21/83, P. Y. Baynard to J. F. Stolz, Question/Response No. 5.
- 7) NRC Safety Evaluation dated 4/6/83, J. F. Stolz to W. S. Wilgus, and its attachment, Technical Evaluation Report (SAI-186-029-29).

Prior commitments reflected by references 5 and 6 regarding training for personnel of these positions are superseded by the following:

- A) FPC will provide one time subject training within a reasonable time frame after appointment of personnel to a position for plant management and key plant functional area management personnel, as well as for Operations Technical Advisors and their direct supervision. This training, in the use of installed plant systems to detect and control or mitigate an accident in which the core is severely damaged, is accomplished via appropriate portions of the Replacement Operator Training Program (see Reference 2). The training will, as a minimum, address the topics identified in Reference 3.
- B) FPC will provide one time subject training, commensurate with assigned responsibilities within a reasonable time frame after appointment of personnel to a position for technicians and their direct supervision as follows:
 1. Instrumentation and Control (I&C) group.
 2. Health Physics group.
 3. Chemistry group.

Implementation specifics of the above commitment can be expected to change from time to time. The time requirements of training may change depending on task analysis and plant modifications. Other training scope parameters for the Replacement Operator Training Program will change as suggested by Reference 2. The positions/personnel requiring subject training can be expected to change with organizational changes and resultant revisions to job and task analyses.

At present, however, those positions/personnel for which training is required per A) above are: Nuclear Plant Manager, Nuclear Plant Engineering and Technical Services Manager, Nuclear Plant Operations Manager, Nuclear Chemistry and Radiation Protection Superintendent, Nuclear Operations Technical Advisor Supervisor, and Nuclear Operations Technical Advisors.

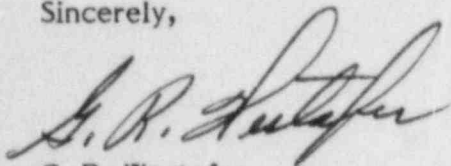
And, at present, those positions/personnel for which training is required per B) above are:

- (1) Senior Nuclear I&C Electrical Supervisor, Nuclear Electrical/I&C Supervisors, Chief Nuclear Technical Support Technicians and Nuclear Technical Support Technicians. This training is described in Attachment I (TDP 310).
- (2) Radiation Protection Manager, Health Physics Supervisors, Chief Health Physics Technicians, Health Physics Technicians. This training is described in Attachment I (TDP 303).
- (3) Nuclear Chemistry Manager, Nuclear Chemistry Supervisors, Chief Nuclear Chemistry Technicians, Nuclear Chemistry Technicians. This training is described in Attachment I (TDP 305).

The above commitment revision is resultant from FPC's implementation of performance based training. Specific technical training programs have been established for craft personnel. The FPC commitment continues to be consistent with the SER, Reference 7.

If there are any questions, please contact this office.

Sincerely,



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

DEP/feb

Attachment

xc: Dr. J. Nelson Grace
Regional Administrator, Region II
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street, N.W., Suite 2900
Atlanta, GA. 30323

ATTACHMENT I

Mitigating Core Damage Training Programs for Technicians and Supervision in the Instrument and Controls, Health Physics and Chemistry Groups

TDP 310 Instrument and Control (I&C) Technician Training - Training Department Procedure 310, Lesson Plan 08-51 A, B, C, D; Objectives:

- 08-51 A - To provide the student with the basic concepts of plant conditions that could or will result in core damage, and the necessary corrective actions to mitigate the possible or actual core damage conditions.
- 08-51 B - To ensure the student has adequate knowledge of incore/out-of-core detector response during core damage situations to recognize and report abnormal indications.
- 08-51 C - To ensure the student has adequate knowledge to measure and report incore detector data during a core damage transient.
- 08-51 D - To ensure the student has adequate knowledge to recognize, measure and report abnormal readings of vital instrumentation.

TDP 303 Health Physics Technician - Training Department Procedure 303, Lesson Plan HPT-51 A, B, C, D; Objectives:

- HPT-51 A - To provide the student with the basic concepts of plant conditions that could or will result in core damage and the necessary corrective actions to mitigate actual or possible core damage conditions.
- HPT-51 B -
 - a) To ensure the student has adequate knowledge to understand and interpret radiation detector behavior during core damage situations.
 - b) To ensure the student understands sources of gas generation during core damage and actions necessary to mitigate condition deterioration.
- HPT-51 C - To ensure the student is knowledgeable in methods for dose rate calculations using outside containment data.
- HPT-51 D - To provide the student with examples of lessons learned during abnormal plant experiences throughout the industry.

TDP 305 Chemistry Technician - Training Department Procedure 305, Lesson Plan CHT-51 A, B, C, D; Objectives:

- CHT-51 A - To provide the student with the basic concepts of plant conditions that could or will result in core damage and the necessary corrective actions to mitigate actual or possible core damage conditions.
- CHT-51 B - To ensure the student is knowledgeable of expected chemistry results during core damage and to be knowledgeable of special handling techniques necessary for highly contaminated liquids.
- CHT-51 C - To ensure the student is knowledgeable of expected isotopic breakdown for core and clad damage.
- CHT-51 D - To ensure the student is aware of corrosion effects of primary water on containment systems/components and causes of failure.