

DEC 24 1985

MEMORANDUM FOR: James G. Partlow, Director  
Division of Inspection Programs  
Office of Inspection and Enforcement

FROM: Dennis F. Kirsch, Deputy Director  
Division of Reactor Safety and Projects, Region V

SUBJECT: COMMENTS ON 2515 PROGRAM INSPECTION PROCEDURES

As requested by your letter of December 2, 1985, we have reviewed the revised inspection procedures 61705, Calibration of Nuclear Instrumentation Systems; 35751, QA/QC Administration Program; 41301, Pre-licensing Review of the Operator Training and Qualification Program. Our comments are summarized below:

61705 - Calibration of Nuclear Instrumentation Systems

Region V had only minor comments. These were discussed with Mr. Cooper on December 17, 1985.

35751 - QA/QC Administration Program

Region V had no comments on this inspection procedure.

41301 - Pre-Licensing Review of the Operator Training and Qualification Program

Paragraph 02.01b(2):

There is no requirement in 10 CFR 55 for the licensee to establish a training program for licensed operators except in the requalification program defined in Appendix A to Part 55. 10 CFR 55.20 through 55.25 define the requirements for the examination prepared and administered by the NRC. The only training requirements for applicants for an operators license are in NUREG-0094, Appendix F and NUREG-0737. However, a training program established by a licensee to train their employees to take a NRC examination for an operator license that did not cover the subject listed in 10 CFR 55.21, 55.22 and 55.23 would not be a very successful program. Therefore, we suggest paragraph 02.01b(2) be deleted, but paragraph 03.01 be revised to explain that a good training program would address the subjects contained in 10 CFR 55.21-23.

We hope these comments will help you provide inspection procedures that are as accurate and comprehensive as possible. If you have any questions about these comments please contact R. J. Pate at 463-3868.

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*For*  
D. F. Kirsch, Deputy Director  
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