

November 5, 1985

DMB014

Docket No. 50-302

Mr. Walter S. Wilgus  
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Florida Power Corporation  
ATTN: Manager, Nuclear Licensing  
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Dear Mr. Wilgus:

We have reviewed the following Florida Power Corporation submittals related to licensed operator training and requalification at Crystal River Unit 3:

1. FPC letter March 15, 1985 (3F0385-12) G. R. Westafer to J. Nelson Grace re: Licensed Operator Requalification Training Program.
2. FPC letter July 23, 1985 (3F0785-27) G. R. Westafer to Hugh L. Thompson, Jr. re: Replacement Operator Training Program.
3. FPC letter July 23, 1985 (3F0785-15) G. R. Westafer to Hugh L. Thompson, Jr. re: Licensed Operator Requalification Training Program Commitment Clarification.
4. FPC letter July 23, 1985 (3F0785-16) G. R. Westafer to Hugh L. Thompson, Jr. re: Replacement Operator Training Program.
5. FPC letter July 23, 1985 (3F0785-13) G. R. Westafer to Hugh L. Thompson, Jr. re: Instructor Qualifications Clarification.

These submittals are deemed to contain changes to your previously approved licensed operator training and requalification training programs. The criteria for review of these submittals included the Standard Review Plan, Chapter 13.2 Acceptance Criteria, 10 CFR 55 Appendix A, and NUREG-0737. Before the changes can be determined to be acceptable, the additional information regarding each of the above submittals described in the enclosed Request for Additional Information should be submitted to the NRC within 45 days of your receipt of this letter.

Sincerely,

*ORIGINAL SIGNED BY*

*JOHN F. STOLZ*

John F. Stolz, Chief  
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Enclosure:  
Request for Additional  
Information

cc w/enclosure: See next page

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Crystal River Unit No. 3 Nuclear  
Generating Plant

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### REQUEST FOR ADDITIONAL INFORMATION

- 1.0 Licensed Operator Requalification Training (March 15, 1985 letter 3F0385-12)
  - 1.1 In Section 1 of the requalification training program description, the licensee states that the content of the lecture sessions is based on the audit and annual examinations. Please provide clarification to address the use of examination results to determine the scope and depth of coverage only and not content. The lecture series curriculum outline or syllabus should be submitted to show that requalification program lecture content is designed to meet the requirements of 10 CFR 55 Appendix A and applicable portions of NUREG-0737.
  - 1.2 In Section 4 of the program description, the licensee should clarify that annual requalification examinations include written examinations and systematic observations and evaluation. Parentheses should be deleted.
  - 1.3 The licensee should provide clarification in section 5.1.2 that topics for preplanned and regularly scheduled lectures are based on 10 CFR 55, Appendix A requirements. Only depth and scope of coverage but not topic selection may be determined based on annual examination results.
  - 1.4 It is not clear how a preplanned lecture series is scheduled taking into account unanticipated events. How does the licensee schedule anything accounting for unanticipated events?
  - 1.5 Licensed personnel may not be exempted from attendance at all requalification program lectures since a requalification program based solely on self-study is not an acceptable substitute for a

lecture series per 10 CFR 55 Appendix A. The licensee should clarify section 5.3 to describe the method used to ensure that an individual's entire requalification program is not accomplished through self study and that lecture topics are covered as required by 10 CFR 55 Appendix A.

- 1.6 Sections 6.3.1 and 6.3.1.1 do not describe how the Operational Proficiency portion of training will be evaluated to comply with requirements for "written examinations which provide a basis for evaluating knowledge of abnormal and emergency procedures" per 10 CFR 55 Appendix A 4.b. The licensee should clarify how the Operational Proficiency training program is designed to provide coverage of required information taking into consideration the results of annual examinations as well as plant drills.
- 1.7 The licensee should provide clarification in section 6.3.1.1 that procedures are reviewed on a regularly scheduled basis per 10 CFR 55 Appendix A 3.d.
- 1.8 The licensee should clarify whether and how trainees will be evaluated as required for the instructional sessions as described in section 6.3.1.1.
- 1.9 The licensee should clarify whether and how the trainees will be evaluated for the plant drills as described in section 6.3.2.
- 1.10 The licensee should clarify how the trainees will be evaluated for the feedback of operating experience training as described in section 6.3.3.
- 1.11 The licensee should describe the criteria to be used for granting exemptions from portions of the requalification training program for backup licensees as described in section 6.4.
- 1.12 Sections 9.1 and 9.2 make a distinction between requalification training for instructors maintaining an active license and

certified instructors. All certified and licensed instructors must be enrolled in appropriate requalification training that meets the requirements of 10 CFR 55 Appendix A, including the required reactivity control manipulations. The licensee should clarify the method by which all instructors meet the requalification requirements of NUREG-0737, I.A.2.1 (March 28, 1980 H.R. Denton letter).

- 1.13 All licensed and certified instructors should take an annual requalification examination as part of the annual requalification program. Exemptions for instructors who write and grade annual requalification examinations may be granted on a limited basis. The licensee should clarify that instructors meet requalification examination requirements and passing criteria.
- 1.14 The licensee should specify what simulator is used for annual simulator training and evaluation and whether that simulator complies with Regulatory Guide 1.149. Note that the use of a simulator for meeting the requirements of 10 CFR 55 Appendix A is allowable if the simulator reproduces the general operating characteristics of the facility involved and the arrangement of the instrumentation and controls of the simulator is similar to that of the facility according to 10 CFR 55 Appendix A.
- 1.15 The licensee should clarify in section 7.2 that records of the requalification program must be maintained for a period of two years from the date of the training to document the participation of each licensed operator and senior operator in the requalification program according to 10 CFR 55 Appendix A. These records must be available for review for NRC evaluation of license renewal.
- 1.16 "Quarterly procedure review sheets" as described in section 6.3.1 constitute a list of procedures to be reviewed as on-the-job performance items. The licensee should describe how these same sheets are to be used to document and evaluate "plant drills"



training in the topics described in section 6.3.1.1. It is not clear how topics such as "Radiation Protection Manual" and "Emergency Plan" are trained and evaluated on-the-job using the procedure review sheets.

- 1.17 The licensee should clarify in Section 6.1.1 that credit for reactivity manipulations should be limited to significant boron changes which result in a change of reactor power or movement of control rods.

## 2.0 Replacement Operator Training Program (July 23, 1985 letter 3F0785-27)

- 2.1 The licensee should provide a description of the course syllabus or curriculum outline for the Replacement Operator Training Program and the Nonlicensed Operator Training Program and identify the segments of those training programs required for initial license training (i.e., reactor operator), senior reactor operator training, and nonlicensed operator training.
- 2.2 The licensee should describe how heat transfer, fluid flow and thermodynamics training is addressed "as necessary" in the Replacement Operator Training Program and how the need is determined.
- 2.3 The licensee should provide the curriculum outline and identify how the required training for heat transfer, fluid flow and thermodynamics is provided in the Replacement Operator Training Program for instant SRO candidates.

## 3.0 Licensed Operator Requalification Training Program Commitment Clarification (July 23, 1985 letter 3F0785-15)

- 3.1 The licensee should clarify that selection of topics listed in 10 CFR 55 Appendix A for requalification training is not optional.

Only the depth and scope of coverage of required topics may be varied based on trainee requalification examination results. The licensee should clarify that training in heat transfer, fluid flow, and thermodynamics as well as mitigation of accidents involving a degraded core are required topics for requalification training.

4.0 Replacement Operator Training Program (July 23, 1985 letter 3F0785-16)

- 4.1 The licensee should provide the Replacement Operator Training Program syllabus or curriculum outline which identifies how training for mitigating core damage is covered in regularly scheduled training for licensed operator and senior operator trainees.

5.0 Instructor Qualifications Clarification (July 23, 1985 letter 3F0785-13)

- 5.1 The licensee should clarify the Crystal River 3 certification and licensing requirements and procedures for instructors and instructor requalification training requirements. All instructors who teach systems, integrated response, transients and simulator courses should be licensed or certified by the NRC on a same type facility (i.e., another B&W facility). Licensed and certified instructors shall be enrolled in requalification training in accordance with NUREG-0737 I.A.2.3 and should take annual requalification examinations. Documentation of instructor participation in requalification program training and evaluation is also required. The licensee's description of instructor certification and requalification in the July 23, 1985 letter does not appear to meet applicable requirements.