



**Duquesne Light**

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December 21, 1987  
ND3VPN:5263

Mr Robert M. Gallo, Chief  
Operations Branch  
Division of Reactor Safety  
U. S. Nuclear Regulatory Commission  
Region 1  
631 Park Avenue  
King of Prussia, PA 19406

Reference: Beaver Valley Power Station, Unit 1  
Docket 50-334, License DPR-66  
10CFR 55.53 C and f.2, SRO Fuel Handler; Active Status

Dear Mr. Gallo:

This is a request for clarification of the rule (10 CFR 55.53 C and f.2) concerning maintenance of active status for SRO Fuel Handlers. The rule states that for senior operators limited to fuel handling, one shift must have been completed. Previous interpretations of this rule as stated at the Regional meeting associated with the new rule was that since these individuals only utilize their license during refuelings they must stand their first shift with an active Senior Reactor Operator.

Our Refueling License Retraining Program (enclosure 1) approved by the NRC December 2, 1986 (enclosure 2) states that any licensee that is current and satisfactory within the scope of the Refueling License Retraining Program and participates in the pre-refueling activities, including testing of fuel handling equipment, review of procedures and supervision of personnel performing refueling activities, shall be considered active. We request that this program remain acceptable for maintenance of an active status. The individuals holding these licenses at our facility have been the responsible Fuel Handling Senior Operators for several refueling outages and are very experienced. Therefore we do not see the need for these licenses to stand one shift with another Senior Reactor Operator.

We would appreciate your response to this request in a timely manner, since we are presently in a refueling outage and expect to commence fuel handling in the near future.

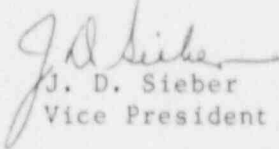
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This request was previously discussed between Mr. T. Burns of our Training Section and Mr. R. Keller of your staff.

Very truly yours,

  
J. D. Sieber  
Vice President Nuclear

JDS:TWB/cal

Enclosure

cc: T. W. Burns  
R. J. Druga  
W. S. Lacey  
R. M. Keller (NRC)  
Central File (2)

## 2.7 REFUELING LICENSE RETRAINING PROGRAM

### 2.7.1 Program Objective

The objective of refueling license retraining is to assure the continued competency of personnel assigned as Refueling Shift Supervisors during refueling and core alterations.

### 2.7.2 Program Applications

Personnel who possess a Senior Reactor Operator's license limited to fuel handling will be continuously enrolled in the Refueling License Retraining Program.

The Refueling License Retraining Program will be conducted continuously for 24 months and upon completion will be followed by successive 24-month programs, each of which will begin promptly at the conclusion of the preceding program. Each 24-month retraining program is comprised of two (2) retraining cycles 1 year in length.

### 2.7.3 Scope of Training

Refueling license retraining is conducted in four (4) phases of instruction or practice, as follows..

1. Phase 1 - Annual Written Examinations. Licensees are administered a comprehensive written examination limited in scope to the duties and responsibilities of Fuel Handling SROs.
2. Phase 2 - Formal Classroom Training. Structured classroom training based in part on the results of annual written examinations.
3. Phase 3 - Oral Examinations. Walk-through of procedures, controls and indications related to Fuel Handling SRO duties.
4. Phase 4 - Individual Study. Review and self-study of significant operating experience reports, procedure reviews, Incident Reports, design changes and procedure changes.

#### 2.7.4 Training Outline

##### 2.7.4.1 Annual Written Examinations

Once each year, licensees will complete a comprehensive written examination similar in scope and style to licensing examinations administered for Fuel Handling SROs by the USNRC. The purposes of these examinations will be to evaluate effectiveness of the prior year's retraining, and to identify areas where training may be required to upgrade knowledge. An overall grade of 80% combined with a grade of at least 70% in each category will be considered passing. The Director, Operations Training, is responsible for development and approval of the annual written examination. The Director, Operations Training, will designate another Senior Reactor Operator to review and approve the examination in conjunction with the Director.

1. Licensees who fail the annual written examination will be relieved of duties requiring a license and will participate in an accelerated retraining program. Refer to Subsection 2.7.5.2.
2. Licensees will be required to complete formal classroom training in any category for which a score of less than 80% is earned.
3. The Director, Operations Training, the Director, Site Operations, and the Plant Manager will review the results of written examinations to determine where emphasis in retraining is needed. Where appropriate, results of this review will be incorporated into Phase 2.

##### 2.7.4.2 Formal Classroom Training

The scope, duration, and precise content of formal classroom training will vary according to needs identified for individual cycles of the Refueling License Retraining Program. Instructional emphasis will be placed where annual written examinations indicate that weaknesses may be developing. Fuel Handling SROs will attend Modules I through IV of the Licensed Operator Retraining Program each cycle. (Refer to Section 2.2.) Modules V and VI will be developed specifically for Fuel Handling SROs. Module V will consist of formal classroom training and the Phase 3 oral examinations. Module VI will consist of

formal classroom training and the annual written examinations of Phase 1.

1. Topic IX - Reactor and Fuel Characteristics
2. Topic X - Equipment, Instrumentation, and Design Descriptions.
3. Topic XI - Procedures and Limitations.
4. Topic XII - Emergency Systems and Safety Devices.
5. Health Physics and Radiation Protection.

NOTE: Technical Specifications and applicable portions of Title 10 CFR are covered with the appropriate Topic.

#### 2.7.4.3 Oral Examinations

Proficiency with normal, abnormal and emergency procedures will be maintained by requiring licensees to demonstrate their familiarity with controls, indications, actions to be taken and expected plant responses. As a minimum, this will be achieved by walk-through exercises and will be considered as a periodic performance evaluation.

#### 2.7.4.4 Individual Study

Licensees will complete periodic reading assignments. The subjects covered in reading assignments may include, but not be limited to, the following as they relate to the duties and responsibilities of Fuel Handling SROs:

1. Facility Design Changes
2. Facility Procedure Changes.
3. Technical Specification Changes.
4. Emergency Preparedness Plan.
5. Radiological Control Procedures.
6. Temporary Station Procedures.

7. Station Industrial Security Procedures.
8. Abnormal and Emergency Procedures.
9. Incident Reports.
10. Significant Operating Experience Reports

#### 2.7.5 Program Administration

##### 2.7.5.1 Responsibility

Responsibility for coordination and supervision of the Refueling License Training Program is delegated to the Director, Operations Training.

##### 2.7.5.2 Accelerated Retraining

Any licensee who scores less than 80% overall on the annual written examination, or scores less than 70% in any category, or fails to receive a satisfactory score on the annual oral examination, will be relieved of duties requiring a license and will be placed in accelerated retraining under the direction of the Director, Operations Training, or his alternate. The licensee will be reinstated to licensed duties after completing the prescribed retraining and scoring at least 80% overall on re-examination and at least 70% in each category, or receiving a satisfactory on the defined weak areas of the annual oral examination.

##### 2.7.5.3 Periodic Examinations

Periodic written examinations or quizzes will be administered to assess licensees' knowledge of topics covered in Phase 2 formal classroom instruction. Remedial training will be performed for licensees who score less than 80% on periodic examinations.

##### 2.7.5.4 Active Licenses

Any Licensee that is current and satisfactory within the scope of the Refueling License Retraining Program and participates in pre-refueling activities, including testing of fuel handling equipment, review

of procedures, and supervision of personnel performing refueling activities shall be considered as having an active license in accordance with 10 CFR 55.31(e). Any Licensee that does not meet this requirement will be considered inactive and will require satisfactory completion of an oral examination administered by an individual with an active refueling Senior Operator License.

#### 2.7.6 Program Documentation

Each of the documents specified in this Subsection will be maintained with the program records for each cycle of the Refueling License Retraining Program.

1. A record of each licensee's participation in the Licensed Operator Retraining Program will be maintained on the Refueling License Retraining Summary (Figure 2.7.1).
2. Attendance during Phase 2 formal classroom training will be reported on the Retraining Attendance Record (Volume 1, Figure 5.8).
3. Phase 4 individual study will be programmed on a monthly basis. The Director Operations Training will prepare the Individual Study Guide (Figure 2.2.2) and distribute a copy to each licensee.
4. Completion of Phase 3 oral examinations will be documented on the Fuel Handling SRO Walk-Through Training Checklist (Figure 2.7.2).
5. A copy of each annual examination, periodic examination, or quiz, answer keys and the answers provided by licensees will be maintained with the individual's examination file and in the Refueling License Retraining Examination file.
6. The Summary of Recommendations (Figure 2.2.5) will be used to document the recommendations for training emphasis arising from the reviews of annual written examination results.



7. All records associated with required accelerated retraining will be maintained in the individual's RLRT file. The records will include a description of the accelerated retraining program, original and retake exam scores, and all pertinent information.

#### 2.7.7 Program References

1. U.S. Nuclear Regulatory Commission Memorandum; Limited License November 21, 1967.
2. 10 CFR 50.54 2(iv).
3. Beaver Valley Refueling Procedures.
4. BVPS-1 - Updated FSAR Section 14.2.1, Fuel Handling Accident.

#### 2.7.8 Summary of Figures

1. Refueling License Retraining Summary - Figure 2.7.1
2. Fuel Handling SRO Walk-through Training Checklist - Figure 2.7.2
3. Retraining Attendance Record - Volume 1, Figure 5.8
4. Individual Study Guide - Volume 2, Figure 2.2.2
5. Summary of Recommendations - Volume 2, Figure 2.2.5





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

December 2, 1986

Docket No. 50-334

Mr. J. D. Sieber, Vice President  
Duquesne Light Company  
Nuclear Operations  
Post Office Box 4  
Shippingport, PA 15077

Dear Mr. Sieber:

Subject: Beaver Valley Unit 1 - Revised Operation Training and Simulator  
Training Programs (TAC 60122)

By letter dated October 30, 1985, you submitted the subject revised programs as a result of our Generic Letter 84-14, "Replacement and Requalification Training Program." Subsequent to that, as a result of our request for additional information dated April 28, 1986, you submitted supplemental information dated June 30 and September 30, 1986.

We have reviewed the documents and have held discussions with your training staff on November 5, 1986. Based on this information, we have determined, with the following clarifications, that the requalification programs for Beaver Valley, Unit 1, meet the conditions contained in Appendix A of 10 CFR 55 and the criteria contained in NUREG-0737 and are, therefore, acceptable. The issues clarified on November 5, 1986 are:

- a) For Section 2.2.4.3, "Plant Manipulations Training," and Section 12.5.3, "Scope of Training (Simulator)," that the need for additional simulator training is developed from information obtained in Section 2.2.4.5, "Performance Evaluations."
- b) That provision for continuing performance evaluations which may require accelerated training are contained in the "Beaver Valley Power Station Administrative Procedure No. 15 -- Evaluation of Job Performance," described in Section 2.2.4.5 of the requalification program.

This completes our efforts on your submittals. The review was performed by J. Buzy of the NRR staff.

A handwritten signature in cursive script that reads "Peter S. Tam".

Peter S. Tam, Project Manager  
-PWR Project Directorate #2  
Division of PWR Licensing-A  
Office of Nuclear Reactor Regulation

cc: See next page

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Mr. J. D. Sieber  
Duquesne Light Company

Beaver Valley 1 Power Station

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