

April 27, 2001

Mr. Otto L. Maynard
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
Post Office Box 411
Burlington, KS 66839

SUBJECT: REQUEST FOR EXEMPTION TO 10 CFR PART 55 REGARDING FIVE
REQUIRED SIGNIFICANT CORE MANIPULATIONS BY LICENSED OPERATORS
FOR WOLF CREEK GENERATING STATION (TAC NO. MB1499)

Dear Mr. Maynard:

By letter dated March 20, 2001 (WO 01-0007), you requested an exemption for individuals in the current operator licensing classes at Wolf Creek Generating Station (WCGS) from the requirements of 10 CFR 55.31(a)(5). Section 55.31(a)(5), "How to Apply," states the applicant shall: "Provide evidence that the applicant, as a trainee, has successfully manipulated the controls of the facility for which a license is sought. At a minimum, five significant control manipulations must be performed which affect reactivity or power level." By the letter, you, acting as an agent for the individuals currently enrolled in an operator training class and identified in Attachment II to the letter, requested an exemption from the requirements of 10 CFR 55.31(a)(5), that require the five significant control manipulations be performed on the facility by the individual applicants. The proposed exemption would allow the identified individual operator licensing applicants to perform the five significant control manipulations on the WCGS simulator facility in lieu of using the actual plant.

Eligibility for an operator license encompasses education, training, and experience factors. Reactivity manipulations are an operating experience requirement addressed by on-the-job training. Use of a plant-referenced simulator of appropriate fidelity for such manipulations is appropriate, based upon improvements in simulator technology, and thirteen years of successful experience in using plant-specific simulation facilities since the 1987 revision of 10 CFR Part 55. Modern plant-specific simulator facilities in operation today are providing accurate and validated plant training and examination scenarios that convey realism in reactivity manipulations and complex plant operations including simultaneous task management and faulted conditions. The proposed exemption would allow part of the plant operating experience requirements for individual operator license eligibility to be fully satisfied in a timely manner within the licensee's Commission-approved training program without impacting operation of the actual plant.

The WCGS operator training program is a Commission-approved training program that is based on a systems approach to training and uses a simulation facility acceptable to the Commission. The licensee stated that unplanned plant power maneuvering will have to occur for the applicants to complete the required manipulations by the December 2001 examination date. The licensee stated that the WCGS simulator models the actual WCGS core. Simulator

fidelity is demonstrated so that significant reactivity control manipulations are completed without procedural exceptions, simulator performance exceptions, or deviations from the approved training scenario sequence. Validation and documentation of simulator performance for each training scenario is in accordance with plant procedures. The licensee stated that this process ensures that the simulator is capable of being used without significant discrepancies from the approved scenario sequence and reflects conditions comparable to the actual plant.

Pursuant to 10 CFR 55.11, "Specific exemptions," the Commission may, upon application by an interested person, or upon its own initiative, grant such exemptions from the requirements of the regulations in this part as it determines are authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest.

The Commission has determined that the proposed alternative method using the plant-referenced simulator facility in lieu of the actual plant, as described above, will meet the intent of performing significant control manipulations. Accordingly, the Commission has determined that the proposed exemption is authorized by law and will not endanger life or property, or the common defense and security, and is otherwise in the public interest. Therefore, exemptions will be granted to the operator licensing applicants listed in the March 20, 2001, letter at the time that the individual operator or senior operator licenses are issued.

Approval upon this basis is consistent with guidelines set forth in SECY 99-225, "Rulemaking Plan for Changes to 10 CFR Part 55 to Reduce Unnecessary Regulatory Burden Associated with the Use of Simulation Facilities in Operator Licensing," for interim regulatory relief in this area.

Sincerely,

/RA/

Bruce A. Boger, Director
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

Docket No. 50-482

cc: See next page

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Docket No. 50-482

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Wolf Creek Generating Station

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