

# **WOLF CREEK** NUCLEAR OPERATING CORPORATION

Britt T. McKinney  
Vice President Operations

**SEP 27 2001**

WO 01-0038

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

Subject: Docket No. 50-482: Revision to Technical Specification 5.3, "Unit Staff Qualifications"

Gentlemen:

Wolf Creek Nuclear Operating Corporation (WCNOC) herewith transmits an application for amendment to Facility Operating License No. NPF-42 for the Wolf Creek Generating Station (WCGS).

This amendment application would revise Technical Specification 5.3, "Unit Staff Qualifications," to revise requirements that have been superseded based on licensed operator training program being accredited by the Institute for Nuclear Power Operations and promulgation of the revised 10 CFR 55, "Operators' Licenses," which became effective on May 26, 1987.

The WCNOC Plant Safety Review Committee and the Nuclear Safety Review Committee have reviewed this amendment application. Attachments I through V provide the required Affidavit, Evaluation, Markup of Technical Specifications, Retyped Technical Specifications, and List of Commitments, respectively, in support of this amendment request.

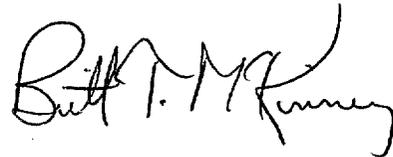
WCNOC requests that the NRC review and approve the proposed TS change by March 29, 2002, to support the continued processing of licensed operator candidates. The proposed Technical Specification change provides the needed flexibility for candidates to complete the licensed operator training program who meet the experience eligibility requirements of an accredited training program consistent with 10 CFR 55.31, "How to apply," but may not meet the American National Standards Institute (ANSI) or ANSI/American Nuclear Society (ANS) or Regulatory Guide 1.8, Revision 2, "Qualification and Training of Personnel for Nuclear Power Plants," experience requirements referenced in current Technical Specification 5.3.1.1.

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It has been determined that this amendment application does not involve a significant hazard consideration in accordance with 10 CFR 50.92. Pursuant to 10 CFR 51.22(b), no environmental assessment need be prepared in connection with the issuance of this amendment.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Kansas State Official. If you should have any questions regarding this submittal, please contact me at (620) 364-4112, or Mr. Tony Harris at (620) 364-4038.

Very truly yours,



Britt T. McKinney

BTM/rlr

Attachments: I - Affidavit  
II - Evaluation  
III - Markup of Technical Specification pages  
IV - Retyped Technical Specification pages  
V - List of Commitments

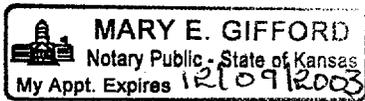
cc: V. L. Cooper (KDHE), w/a  
J. N. Donohew (NRC), w/a  
W. D. Johnson (NRC), w/a  
E. W. Merschoff (NRC), w/a  
Senior Resident Inspector (NRC), w/a

STATE OF KANSAS )  
 ) SS  
COUNTY OF COFFEY )

Britt T. McKinney, of lawful age, being first duly sworn upon oath says that he is Vice President Operations of Wolf Creek Nuclear Operating Corporation; that he has read the foregoing document and knows the contents thereof; that he has executed the same for and on behalf of said Corporation with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By *Britt T. McKinney*  
Britt T. McKinney  
Vice President Operations

SUBSCRIBED and sworn to before me this 27<sup>th</sup> day of Sept, 2001.



*Mary E. Gifford*  
Notary Public

Expiration Date 12/09/2003

**ATTACHMENT II**  
**EVALUATION**

## EVALUATION

### 1.0 DESCRIPTION

This amendment application would revise Technical Specification (TS) 5.3, "Unit Staff Qualifications," to revise requirements that have been superseded based on licensed operator training program being accredited by the Institute for Nuclear Power Operations (INPO) and promulgation of the revised 10 CFR 55, "Operators' Licenses," which became effective on May 26, 1987 (Reference 1).

### 2.0 PROPOSED CHANGE

TS Section 5.3, "Unit Staff Qualifications," Specification 5.3.1 will be revised to specify an exception that requires licensed operators to comply with the requirements the National Academy for Nuclear Training guidelines for initial training and qualification in lieu of ANSI/ANS 3.1-1981 as endorsed by Regulatory Guide 1.8, Revision 2. Specification 5.3.1.1 will be revised to state:

"Licensed Operators and Senior Operators shall meet or exceed the qualifications of the National Academy for Nuclear Training, "Guidelines for Initial Training and Qualification of Licensed Operators," January 2000.

The proposed TS change provides the needed flexibility for candidates to complete the licensed operator training program who meet the experience eligibility requirements of an accredited training program consistent with 10 CFR 55.31, "How to apply," but may not meet the American National Standards Institute (ANSI) or ANSI/American Nuclear Society (ANS) or Regulatory Guide 1.8, Revision 2, "Qualification and Training of Personnel for Nuclear Power Plants," experience requirements referenced in current TS 5.3.1.1.

### 3.0 BACKGROUND

On March 20, 1985, the NRC issued the Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel, (Reference 2) which endorsed the training accreditation program developed by INPO, in association with its National Academy for Nuclear Training (NANT). Subsequently, in NRC Generic Letter 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing 10 CFR 55 and Conforming Amendments," (Reference 3), and NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," (Reference 4), the NRC indicated it would accept a licensee's licensed operator training program if it is accredited and based on a systems approach to training. This accreditation obviates the need to conform to the guidance of either ANSI N 18.1-1971 (Reference 5) or ANSI/ANS 3.1-1978 (Reference 6). Reference 4 notes that References 5 and 6 may be superseded by INPO accreditation in accordance with the revised 10 CFR 55, and that licensees may submit a request to the NRC for an administrative change to their TS to revise or delete, as appropriate, the TS requirements which have been superseded.

In addition, the NRC has published NRC Regulatory Issue Summary 2001-01, "Eligibility of Operator License Applicants," dated January 18, 2001 (Reference 7), "to familiarize addressees with the NRC's current guidelines for the qualification and training of reactor operator (RO) and senior operator (SO) license applicants." This document again acknowledges that 10 CFR 55.31(a)(4), as amended on March 25, 1987, states that, "...the Commission may accept certification that the applicant has successfully completed a Commission-approved training program that is based on a systems approach to training . . ." Regulatory Issue Summary (RIS) 2001-01 further makes the following statements:

" . . .a facility licensee's training program would be considered approved by the NRC when it is accredited by the National Nuclear Accrediting Board (NNAB)."

"The fact that every facility licensee has voluntarily obtained and periodically renewed the accreditation of its licensed operator training program suggests that every facility licensee is implementing the education and experience guidelines endorsed by the NNAB. The NRC staff understands that the current version of those guidelines are outlined by the National Academy for Nuclear Training (NANT) in its 'Guidelines for Initial Training and Qualification of Licensed Operators,' (NANT 2000 guidelines) which were issued in January 2000."

" . . .the NANT's guidelines for education and experience (those that were in effect in 1987 or those that were issued in January 2000) outline acceptable methods for implementing the Commission's regulations in this area."

"The staff encourages all facility licensees to review their requirements and commitments related to RO and SO education and experience and to update their documentation (e.g., FSAR, TS, and training program descriptions) to enhance consistency and minimize confusion."

#### **4.0 TECHNICAL ANALYSIS**

Licensed operator qualifications and training can have an indirect impact on accidents previously evaluated. However, the NRC considered this impact during the rulemaking process, and by promulgation of the revised 10 CFR 55 rule, determined that this impact remains acceptable when licensees have an accredited licensed operator training program which is based on a systems approach to training. The NRC has concluded in References 4 and 7 that the standards and guidelines applied by INPO in their training accreditation program are equivalent to those put forth or endorsed by the NRC. Therefore, maintaining an INPO accredited, systems based licensed operator training program is equivalent to maintaining an NRC approved licensed operator training program which conforms with applicable NRC Regulatory Guides or NRC endorsed industry standards.

The licensed operator qualifications and training program will continue to comply with the requirements of 10 CFR 55. The WCNOC licensed operator training program is accredited by INPO and is based on a systems approach to training.

Since the proposed TS change is administrative in nature, it does not affect plant design, hardware, system operation, or procedures.

Based on the above discussion, the proposed TS change is consistent with 10 CFR 55 and does not adversely affect nuclear safety or plant operations.

## 5.0 REGULATORY ANALYSIS

### 5.1 No Significant Hazards Consideration

Wolf Creek Nuclear Operating Corporation (WCNOC) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

**1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?**

Response: No

The proposed TS change is an administrative change to clarify the current requirements for licensed operator qualifications and licensed operator training program. These changes conform to the current requirements of 10 CFR 55.

Although licensed operator qualifications and training may have an indirect impact on accidents previously evaluated, the NRC considered this impact during the rulemaking process, and by promulgation of the revised 10 CFR 55 rule, concluded that this impact remains acceptable as long as the licensed operator training program is certified to be accredited and is based on a systems approach to training. WCNOC's licensed operator training program is accredited by INPO and is based on a systems approach to training. The proposed TS change takes credit for the INPO accreditation of the licensed operator training program. The TS requirements for all other unit staff qualifications remain unchanged.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

**2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?**

Response: No

The proposed TS change is an administrative change to clarify the current requirements for licensed operator qualifications and licensed operator training program and to conform to the revised 10 CFR 55.

As noted above, although licensed operator qualifications and training may have an indirect impact on the possibility of a new or different kind of accident from any accident previously evaluated, the NRC considered this impact during the rulemaking process, and by promulgation of the revised rule, concluded that this impact remains acceptable as long as the licensed operator training program is certified to be accredited and based on a systems approach to training. As previously noted, WCNOC's licensed operator training program is accredited by INPO and is based on a systems approach to training. The

proposed TS change takes credit for the INPO accreditation of the licensed operator training program. The TS requirements for all other unit staff qualifications remain unchanged.

Additionally, the proposed TS change does not affect plant design, hardware, system operation, or procedures. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

**3. Does the proposed change involve a significant reduction in a margin of safety?**

Response: No

The proposed TS change is an administrative change to clarify the current requirements applicable to licensed operator qualifications and licensed operator training program. This change is consistent with the requirements of 10 CFR 55. The TS qualification requirements for all other unit staff remain unchanged.

Licensed operator qualifications and training can have an indirect impact on a margin of safety. However, the NRC considered this impact during the rulemaking process, and by promulgation of the revised 10 CFR 55, determined that this impact remains acceptable when licensees maintain a licensed operator training program that is accredited and based on a systems approach to training. As noted previously, WCNO's licensed operator training program is accredited by INPO and is based on a systems approach to training.

The NRC has concluded, as stated in NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," that the standards and guidelines applied by INPO in their training accreditation program are equivalent to those put forth or endorsed by the NRC. As a result, maintaining an INPO accredited, systems approach based licensed operator training program is equivalent to maintaining NRC approved licensed operator training program which conform with applicable NRC Regulatory Guides or NRC endorsed industry standards. The margin of safety is maintained by virtue of maintaining an INPO accredited licensed operator training program.

In addition, the NRC has recently published NRC Regulatory Issue Summary 2001-01, "Eligibility of Operator License Applicants," dated January 18, 2001, "to familiarize addressees with the NRC's current guidelines for the qualification and training of reactor operator (RO) and senior operator (SO) license applicants." This document again acknowledges that the INPO National Academy for Nuclear Training (NANT) guidelines for education and experience, outline acceptable methods for implementing the NRC's regulations in this area.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above, WCNO's concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c) and, accordingly, a finding of "no significant hazards consideration" is justified.

## 5.2 Applicable Regulatory Requirements/Criteria

- 10 CFR 55.4 defines systems approach to training to mean a training program that includes the following five elements:
  - (1) Systematic analysis of the jobs to be performed.
  - (2) Learning objectives derived from the analysis which describe desired performance after training.
  - (3) Training design and implementation based on the learning objectives.
  - (4) Evaluation of trainee mastery of the objectives during training.
  - (5) Evaluation and revision of the training based on the performance of trained personnel in the job setting.

The WCNOG licensed operator training program is accredited by INPO and is based on a systems approach to training. The licensed operator qualifications and training program will continue to comply with the requirements of 10 CFR 55.

- 10 CFR 55.31(a)(4) specifies in part that the Commission may accept certification that the applicant has successfully completed a Commission-approved training program that is based on a systems approach to training and that uses a simulation facility acceptable to the Commission under 10 CFR 55.45(b). NRC Generic Letter 87-07 and NUREG-1262, indicated that the NRC would accept a licensee's licensed operator training program if it is accredited and based on a systems approach to training.

The WCNOG licensed operator training program is accredited by INPO and is based on a systems approach to training. The licensed operator qualifications and training program will continue to comply with the requirements of 10 CFR 55.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

## 6.0 ENVIRONMENTAL CONSIDERATION

WCNOG has evaluated the proposed TS change request consistent with the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21, "Criteria for and identification of licensing and regulatory actions requiring environmental assessments." WCNOG has determined that this proposed TS change request meets the criteria for a categorical exclusion set forth in paragraph (c)(10) of 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review." This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50, "Domestic Licensing of Production and Utilization Facilities," and it changes recordkeeping, reporting, or administrative procedures or requirements. Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the proposed amendment.

## **7.0 REFERENCES**

1. Volume 52, Federal Register, Page 9453 (52 FR 9453), dated March 25, 1987.
2. "Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel," 50 FR 11147, dated March 20, 1985.
3. NRC Generic Letter 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing 10 CFR 55 and Conforming Amendments," dated March 19, 1987.
4. NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," published November 1987.
5. ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel."
6. ANSI/ANS 3.1- 1978, "Selection, Qualification and Training of Personnel for Nuclear Power Plants.
7. NRC Regulatory Issue Summary 2001-01, "Eligibility of Operator License Applicants," dated January 18, 2001.

**ATTACHMENT III**  
**MARKUP OF TECHNICAL SPECIFICATION PAGES**

## 5.0 ADMINISTRATIVE CONTROLS

### 5.3 Unit Staff Qualifications

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- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 with the following exceptions:
- 5.3.1.1 Licensed Operators and Senior Operators shall meet or exceed the qualifications of ~~ANSI/ANS 3.1-1981 as endorsed by Regulatory Guide 1.8, Revision 2, and 10 CFR Part 55.~~
  - 5.3.1.2 The position of Manager Chemistry/Radiation Protection shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 for a Radiation Protection Manager.
  - 5.3.1.3 The position of Manager Operations shall hold or have previously held a senior reactor operator license for a similar unit (PWR).
- 5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).
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the National Academy for Nuclear Training, "Guidelines for Initial Training and Qualification of Licensed Operators," January 2000.

**ATTACHMENT IV**  
**RETYPE TECHNICAL SPECIFICATION PAGES**

## 5.2 Organization

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### 5.2.2 Unit Staff (continued)

shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

- c. An individual from the Health Physics Group qualified in radiation protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- d. Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., licensed Senior Reactor Operator (SROs), licensed Reactor Operator (ROs), health physics technicians, nuclear station operators, and key maintenance personnel).

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime. Any deviation from the above guidelines shall be authorized in advance by the Plant Manager or the Plant Manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.

- e. The Superintendent Operations or Manager Operations shall hold an SRO license.
  - f. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This position shall be manned in MODES 1, 2, 3 or 4, unless the Shift Manager or the individual with a Senior Operator License meets the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.3 Unit Staff Qualifications

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5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 with the following exceptions:

5.3.1.1 Licensed Operators and Senior Operators shall meet or exceed the qualifications of the National Academy for Nuclear Training, "Guidelines for Initial Training and Qualification of Licensed Operators," January 2000.

5.3.1.2 The position of Manager Chemistry/Radiation Protection shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 for a Radiation Protection Manager.

5.3.1.3 The position of Manager Operations shall hold or have previously held a senior reactor operator license for a similar unit (PWR).

5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).

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**LIST OF COMMITMENTS**

The following table identifies those actions committed to by Wolf Creek Nuclear Operating Corporation (WCNOC) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Tony Harris, Manager Regulatory Affairs at Wolf Creek Generating Station, (620) 364-4038.

<b>COMMITMENT</b>	<b>Due Date/Event</b>
None	