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February 13, 2002
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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop O-P1-17
Washington, D.C. 20555-0001

Subject: **TS 6.3.2 STA Qualification Requirements Clarification**

References:

1. Training Memorandum, JTRG-02-013, Analysis of the STA Training Program, dated January 21, 2002.
2. NSE-JAF-SE-95-021 Update of FSAR Section 13.3, Training of Personnel, dated May 3, 1995.
3. USNRC Regulatory Guide 1.8, Rev 3, dated May, 2000, Qualification and Training of Personnel for Nuclear Power Plants.
4. ANSI/ANS-3.1-1993, American National Standard for Selection, Qualification, and Training of Personnel for Nuclear Power Plants, dated April 23, 1993.
5. 50 FR 43621, Commission Policy Statement on Engineering Expertise on Shift, dated October 26, 1985.
6. INPO 90-003, Training and Qualification of Shift Technical Advisors.

Dear Sir:

The training programs at JAF are established, implemented, and maintained using a systems approach to training (SAT) in accordance with the provisions of 10CFR 55 and 10 CFR 50.120. Additionally, the current STA Training Program is one of several JAF programs accredited by the National Academy of Nuclear Training and was previously evaluated by JAF via 10 CFR 50.59 (Reference 2).

The JAF Training Department has reviewed the qualifications, training, and experience requirements for the Shift Technical Advisor (STA) position (Reference 1) and concluded that the current program meets the existing INPO guidelines (Reference 6) and

meets or exceeds the minimum education and experience guidelines currently stated in USNRC Regulatory Guide 1.8 (Reference 3). Regulatory Guide 1.8 was issued by the NRC staff as acceptable guidance regarding qualifications and training for Nuclear Power Plant Personnel and endorses ANSI/ANS 3.1-1993 (Reference 4).

ANSI/ANS 3.1-1993 was determined to be acceptable to the NRC staff for complying with the qualifications and training requirements of 10 CFR Parts 50 and 55 (with specified additions, exceptions, and clarifications) and with the guidance regarding the STA function provided in 50 FR 43621. 50 FR 43621 provides the qualifications criteria for the STA position, which states in part, that the dual role SRO/STA position (Option 1) requires a Bachelor's Degree or PE License and the Continued Use STA position (Option 2) requires a Bachelor's Degree or "equivalent." These criteria are further explicitly stated in JAF Technical Specification 6.3.2

Presently, all JAF STAs meet the requirements of TS 6.3.2 by virtue of having a Bachelor's Degree in engineering, engineering technology, or physical science from an accredited institution, or meet the exception per "Note (1)" of TS 6.3 by virtue of having completed the Commission approved JAF Advanced Technical Training Program. JAF has determined that requiring a BS degree in engineering or related science places inordinate confidence in "academic" credentials. The current STA training program has evolved since 1985, based on industry lessons learned and the development of formal guidelines for the STA training program (Reference 6), in an attempt to attain industry consistency. The result of these industry efforts and NRC reviews has been the implementation of a systems approach to training in accordance with 10 CFR 50.120.

As stated above, the current accredited JAF STA Program has been assessed and determined to meet the requirements of 10 CFR 50.120 (Reference 1) and the guidelines provided in INPO 90-003 (Reference 6). Additionally, Regulatory Guide 1.8, Rev. 3 (Reference 3), provided as acceptable guidance for qualifications and training of Nuclear Power Plant Personnel, endorses ANSI/ANS 3.1-1993 (Reference 4), which states in section 4.1.1.1 regarding alternatives to degree requirements:

"Individuals who do not possess the formal education requirements specified in this section shall not be automatically eliminated if other factors provide sufficient demonstration of their abilities to fulfill the duties of a specific position. These factors shall be evaluated on a case-by-case basis, and approved and documented by the owner organization."

In summary, JAF considers the current training program accredited by the National Academy for Nuclear Training for the STA Program to be the approved training program. This program has been established, implemented, and maintained using a systems approach to training in accordance with the provisions of 10CFR 50.120 and the guidelines of INPO 90-003 (Reference 6). Guidelines provided in Section 4.2 of INPO 90-003 (Reference 6) are consistent with the training and qualification requirements delineated in ANSI/ANS 3.1-1993 regarding alternatives to degree requirements.

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Although not yet implemented, it is our intent to maintain an option to determine equivalencies for the degree requirements on a case-by-case basis. If and when this occurs, this action may be considered a deviation to the specific wording of TS 6.3.2 for Option 1 (i.e., requirement for a Bachelor's Degree or PE license).

This deviation is justified as discussed above and, as required by TS 6.3.3, this letter serves as formal notice of the JAF position that the accredited STA training program, including the training and qualification requirements as delineated in ANSI/ANS 3.1-1993 (i.e., alternatives to degree requirements), meets or exceeds the minimum STA training and qualifications requirements in TS 6.3.2. This position is consistent with the intent of TS 6.3.2 to provide shift engineering expertise on shift, and provides crew staffing flexibility without diminishing shift capabilities or expertise.

Please contact Messrs. Rick Plasse (315 349-6793) or Phil Russell (315 349-6301) with any questions.

Very truly yours,



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