

July 31, 2002

MEMORANDUM TO: William D. Reckley, Section Chief
Project Directorate IV-1
Division of Licensing and Project Management, NRR

FROM: */RA/*
David C. Trimble, Section Chief
Operator Licensing and Human Performance Section
Equipment and Human Performance Branch (IEHB)
Division of Inspection Program Management, NRR

SUBJECT: SAFETY EVALUATION REGARDING UNIT STAFF QUALIFICATION
REQUIREMENTS FOR COMANCHE PEAK STEAM ELECTRIC
STATION (MB4732 AND MB4733)

Plant Name: Comanche Peak Steam Electric Station, Units 1 and 2
Utility: TXU Generation Company LP
Docket Nos. 50-445 and 50-446
TAC Nos.: MB4732 AND MB4733
Operating License: NPF-87 and NPF-89
Project Manager: Dave Jaffe
Review Branch: IEHB
Review Status: Complete

In a work request dated April 10, 2002, IEHB was asked to review the TXU Generation Company LP (TXU Energy) request to revise requirements regarding Unit Staff Qualifications for the licensed operator training program. The change revises requirements that have been superseded based on licensed operator training programs being accredited by the Institute of Nuclear Power Operations and promulgation of the revised 10 CFR Part 55, "Operators' Licenses," which became effective on May 26, 1987.

The IEHB staff concludes that TXU Energy's request is consistent with and meets the relevant review criteria and is acceptable. The staff's safety evaluation is attached.

A. J. Mendiola

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The principal reviewer for this assessment was Richard Pelton. If you have any questions he can be reached at 415-1028. IEHB considers its efforts on TAC Nos. MB4732 and MB4733 to be complete.

Attachment: As stated

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Dave Jaffe

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SAFETY EVALUATION REGARDING UNIT STAFF QUALIFICATION
REQUIREMENTS FOR TXU GENERATION COMPANY LP
DOCKET NOS. 50-445 and 50-446

1. INTRODUCTION

By letter dated March 27, 2002, TXU Generation Company LP (TXU Energy) submitted a technical specification revision request for Comanche Peak Steam Electric Station (CPSES), Units 1 and 2, to the NRC for approval.

2. REGULATORY EVALUATION

On March 20, 1985, the NRC issued the Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel which endorsed the training accreditation process and the National Academy for Nuclear Training (NANT). In Generic Letter 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing - 10 CFR 55 and Conforming Amendments," dated March 19, 1987, and in 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, the NRC indicated it would accept a facility's licensed operator training program if the facility certified in writing that the program was accredited and based on a systems approach to training (SAT). This certification would supersede the requirements of ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," and ANSI/ANS-3.1-1978, "Selection, Qualification and Training of Personnel for Nuclear Power Plants." Facility licensees were advised to submit a request to the NRC for an administrative change to their licensing documents to revise or delete, as appropriate, the requirements that had been superseded.

In 1992 the NRC published its proposed rule 10 CFR 50.120, "Training and Qualification of Nuclear Power Plant Personnel." The proposed rule stated that, if adopted, the rule would supersede the Policy Statement on Training and Qualification of Nuclear Power Plant Personnel and would not result in any change to accredited programs. The Commission concluded that accredited programs, implemented consistent with industry objectives and criteria would be in compliance with this regulation. In April 1993, the NRC published its final rule on training and qualification of nuclear power plant personnel. The rule requires nuclear power plant licensees to establish, implement, and maintain SAT-based training programs for nine non-licensed positions. Accreditation of these nine training programs is an acceptable means of meeting the requirements of 10 CFR 50.120.

On January 18, 2001, the NRC published NRC Regulatory Issue Summary (RIS) 2001-01, "Eligibility of Operator License Applicants," to familiarize licensees with the NRC's current guidelines for the qualification and training of reactor operator and senior operator license applicants. RIS 2001-01 acknowledged that 10 CFR 55.31(a)(4) allows the NRC to accept an application for an operator's license if the facility licensee certifies that the applicant has successfully completed a Commission-approved training program that is based on a systems approach to training. In addition, RIS 2001-01 stated that: (1) a training program would be considered approved by the NRC when it receives or renews accreditation from the National Nuclear Accrediting Board (NNAB); (2) accreditation of operator training programs suggests that facilities are implementing the education and experience guidelines endorsed by the NNAB;

(3) NANT guidelines for education and experience (those in effect in 1987 or those issued in January 2000) outline acceptable methods for implementing the Commission's regulations; and (4) the staff encourages all facility licensees to review their requirements and commitments related to licensed operator and senior operator education and experience and to update their documentation (e.g., Final Safety Analysis Report, Technical Specifications, and training program descriptions) to "enhance consistency and minimize confusion."

3. TECHNICAL EVALUATION

The revision proposed by TXU Energy will revise Technical Specification (TS) Section 5.3, "Unit Staff Qualifications." The requested revision will update requirements that had been outdated based on licensed operator training programs being accredited by the Institute of Nuclear Power Operations and promulgation of the revised 10 CFR 55, "Operators' Licenses." TS Section 5.3 describes the requirements for unit staff qualifications. These changes conform to the current requirements of 10 CFR 55. The TS requirements for all other unit staff qualifications remain unchanged.

The NRC staff concludes that the revised qualification requirements in TS Section 5.3 are adequate because they conform with the reactor operator and senior reactor operator license eligibility criteria and standards acceptable to the NRC. In addition, the changes will not affect the 10 CFR 50.36(c)(5) requirement to ensure the licensee maintains administrative controls that assure the operation of the facility in a safe manner.

4. CONCLUSION

Based on the above discussion, the proposed revision to TS Section 5.3, "Unit Staff Qualifications" is consistent with 10 CFR Part 55 and does not adversely affect nuclear safety or plant operations.

The Commission has concluded, based on the considerations discussed above, that: (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 amendments will not be inimical to the common defense and security or to the health and safety of the public.