



March 19, 2003

L-PI-03-026
10 CFR 50.90
10 CFR 55

U S Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
DOCKET Nos. 50-282 AND 50-306
LICENSE Nos. DPR-42 AND DPR-60
LICENSE AMENDMENT REQUEST (LAR) DATED MARCH 19, 2003
CLARIFICATION OF LICENSED OPERATOR QUALIFICATIONS

Attached is a request for change to the Technical Specifications (TS), Appendix A of the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2. The Nuclear Management Company, LLC (NMC) submits this request in accordance with the provisions of 10 CFR 50.90.

This LAR proposes to revise requirements in TS 5.3 regarding Plant Staff Qualifications. The requested change will revise requirements that have been superseded based on licensed operator training programs being accredited by the National Academy for Nuclear Training (NANT) and promulgation of the revised 10 CFR 55, "Operators' Licenses," which became effective on May 26, 1987.

The Nuclear Regulatory Commission (NRC) has published NRC Regulatory Issue Summary (RIS) 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." RIS 2001-01 makes the following statements:

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 [National Nuclear Accrediting Board] 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."

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. . . 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.

As such, NMC requests the NRC approve the methods described in the NANT (ACAD 00-003), "Guidelines for Initial Training and Qualification of Licensed Operators," dated January 2000, for meeting the education and experience eligibility requirements at the Prairie Island Nuclear Generating Plant, Units 1 and 2. Institute for Nuclear Power Operations (INPO) letter dated August 13, 2002, from W.J. Hastie, INPO, to D.B. Pinckney, NRC, provided ACAD 00-003 for placement in the Public Document Room.


Attachment A contains the licensee's evaluation of this LAR. Attachment B presents the TS page marked up to show the proposed changes. Since there are no Bases associated with Section 5.0 of the TS, no Bases markups or corrections are included in this submittal. Attachment C presents the revised TS page incorporating the proposed changes. Attachment D provides the commitments made in this LAR.

NMC requests that the NRC review and approve the proposed TS change for the Prairie Island Nuclear Generating Plant by August 8, 2003, to support processing of licensed operator candidates. The proposed Technical Specification changes provide the needed flexibility for candidates to complete the licensed operator training programs who meet the experience eligibility requirements of accredited training programs consistent with 10 CFR 55.31, "How to apply," but may not meet the education and experience requirements referenced in the plant's current Technical Specifications.

In accordance with 10 CFR 50.91, NMC is notifying the State of Minnesota of this LAR by transmitting a copy of this letter and attachments to the designated State Official.

Please address any comments or questions regarding this LAR to Mr. Dale Vincent at 1-651-388-1121.

I declare under penalty of perjury that the foregoing is true and accurate. Executed on March 19, 2003.


Joseph M. Solymossy
Site Vice President
Prairie Island Nuclear Generating Plant

(Copies and attachments shown on page 3)

C: Regional Administrator - Region III, NRC
Senior Resident Inspector, NRC
NRR Project Manager, NRC
Glenn Wilson, State of Minnesota

Attachments:

Attachment A, Licensee Evaluation
Attachment B, Marked Up Pages
Attachment C, Revised Pages
Attachment D, List of Commitments

ATTACHMENT A
LICENSEE EVALUATION

Clarification of Licensed Operator Qualifications

1.0 DESCRIPTION

Pursuant to 10 CFR Part 50, Section 50.90, the holders of Operating Licenses DPR-42 and DPR-60 hereby propose the following changes to the Technical Specifications (TS) contained in Appendix A of the Facility Operating Licenses:

The Nuclear Management Company, LLC (NMC) proposes TS changes that will revise TS 5.3 requirements that have been superseded based on licensed operator training programs being accredited by the National Academy for Nuclear Training (NANT) and promulgation of the revised 10 CFR 55, "Operators' Licenses," which became effective on May 26, 1987 (Reference 1).

2.0 PROPOSED CHANGE

A brief description of the proposed changes is provided below along with a discussion of the justification for each change. The specific wording changes to the Technical Specifications are provided in Attachments B and C.

TS 5.3, Specification 5.3.1: The TS plant staff qualifications, TS 5.3, Specification 5.3.1, will be revised to specify an exception to the current TS minimum qualifications that requires licensed operators to meet the education and experience eligibility requirements of the NANT (ACAD 00-003), "Guidelines for Initial Training and Qualification of Licensed Operators," dated January 2000, as specified in the NMC cover letter for this license amendment request (LAR).

These proposed TS changes provide 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," paragraph 4, but may not meet the Regulatory Guide (RG) or American National Standards Institute (ANSI) experience requirements referenced in the current Technical Specification 5.3.1.

3.0 BACKGROUND

On March 20, 1985, the U.S. Nuclear Regulatory Commission (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 the Institute for Nuclear Power Operations (INPO), in association with NANT. Subsequently, in References 3 and 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 Reference 5 or 6 which are currently referenced in the plant TS. Reference 4 notes that References 5 and 6 may be superseded by INPO (NANT) 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.

On January 18, 2001, the NRC issued Regulatory Issue Summary (RIS) 2001-01, "Eligibility of Operator License Applicants," (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 RIS 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 . . ." The RIS 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 these guidelines are outlined by the National Academy for Nuclear Training (NANT) in its "Guidelines for Initial Training and Qualification of License 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., [Final Safety Analysis Report] FSAR, TS, and training program descriptions) to enhance consistency and minimize confusion.

To accomplish this, in part, NMC is proposing changes to TS 5.3, Specification 5.3.1 to clarify education and experience eligibility requirements for license operator applicants.

This LAR does not propose to change the qualifications and training programs for any other plant staff.

The NRC has previously approved similar changes for numerous other nuclear power plants including: Millstone Nuclear Power Station, Units 2 and 3 by NRC Safety Evaluation dated December 5, 2001 (TAC NOS. MB2829 and MB2319), Byron Station, Units 1 and 2, and Braidwood Station, Units 1 and 2 by NRC Safety Evaluation dated September 24, 2002 (TAC NOS. MB2683, MB2684, MB2685, and MB2686), and Wolf Creek Generating Station by NRC Safety Evaluation dated November 26, 2002 (TAC NO. MB3017).

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 (NANT) in their training accreditation program are equivalent to those put forth or endorsed by the NRC. Therefore, maintaining an NANT 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 Prairie Island Nuclear Generating Plant (PINGP) licensed operator training program is accredited by NANT and is based on a systems approach to training. Since the proposed TS changes are administrative in nature, they do not affect plant design, hardware, system operation, or procedures.

Based on the above discussion, the proposed TS changes are consistent with 10 CFR 55 and do not adversely affect nuclear safety or plant operations.

These changes are proposed in consideration of the guidance of RIS 2001-01 which encouraged licensees to update their documentation (including TS) to current operator education and experience requirements. RIS 2001-01 indicates that this type of change, updating the plant licensing basis for eligibility requirements for operator license applicants, would be considered administrative in nature. Therefore these proposed changes to the TS are acceptable.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Consideration

The Nuclear Management Company 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 Technical Specification change is an administrative change to clarify the current requirements for licensed operator qualifications and the licensed operator training program. With this change, the Technical Specifications continue to meet 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 programs are certified to be accredited and are based on a systems approach to training. The Prairie Island Nuclear Generating Plant licensed operator training program is accredited by the National Academy for Nuclear Training and is based on a systems approach to training. The proposed Technical Specification change takes credit for the National Academy for Nuclear Training accreditation of the licensed operator training program. The Technical Specification requirements for all other plant 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 Technical Specification change is an administrative change to clarify the current requirements for licensed operator qualifications and the licensed operator training program and to conform to the revised 10 CFR 55.

As discussed 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 licensed operator training programs are certified to be accredited and based on a systems approach to training. As previously noted, the Prairie Island Nuclear Generating Plant licensed operator training program is accredited by the National Academy for Nuclear Training and is based on a systems approach to training. The proposed Technical Specification change takes credit for the National Academy for Nuclear Training accreditation of the licensed operator training program. The Technical Specification requirements for all other plant staff qualifications remain unchanged.

Additionally, the proposed Technical Specification 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 Technical Specification change is an administrative change to clarify the current requirements applicable to licensed operator qualifications and the licensed operator training program. With this change the Technical Specifications continue to be consistent with the requirements of 10 CFR 55. The Technical Specification qualification requirements for all other plant 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, the Prairie Island Nuclear Generating Plant licensed operator training program is accredited by the National Academy for Nuclear Training 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 the Institute for Nuclear Power Operations' National Academy for Nuclear Training in their training accreditation program are equivalent to those put forth or endorsed by the NRC. As a result, maintaining an National Academy for Nuclear Training accredited, systems approach 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 margin of safety is maintained by virtue of maintaining the National Academy for Nuclear Training accredited licensed operator training program.

In addition, the NRC 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 Institute for Nuclear Power Operations' National Academy for Nuclear Training 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, the Nuclear Management Company 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

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 Prairie Island Nuclear Generating Plant licensed operator training program is accredited by the National Academy for Nuclear Training 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

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 Prairie Island Nuclear Generating Plant licensed operator training program is accredited by the National Academy for Nuclear Training 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

The Nuclear Management Company has evaluated the proposed TS change 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." The proposed amendment is confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10CFR51.22(c)(10). Therefore, pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendments.

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' License," published November 1987.

5. Regulatory Guide 1.8, Revision 1, September 1975, "Qualification and Training of Personnel for Nuclear Power Plants."
6. ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel."
7. NRC Regulatory Issue Summary 2001-01, "Eligibility of Operator License Applicants," dated January 18, 2001.

ATTACHMENT B

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

License Amendment Request dated March 19, 2003

Marked Up Technical Specification Page
(Additions shaded, deletions strikethrough)

5.0-5

5.0 ADMINISTRATIVE CONTROLS

5.3 Plant Staff Qualifications

- 5.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, Revision 1, September 1975 except for (1) personnel who perform the function of shift technical advisor shall hold an SRO license and have a bachelors degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents, and (2) the operations manager who shall meet the requirements of ANSI N18.1-1971, except that NRC license requirements are as specified in TS 5.2.2.e, **and (3) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be those previously reviewed and approved by the NRC, specifically those referenced in NMC letter dated March 19, 2003.**
- 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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ATTACHMENT C

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

License Amendment Request dated March 19, 2003

Revised Technical Specification Page

5.0-5

5.0 ADMINISTRATIVE CONTROLS

5.3 Plant Staff Qualifications

5.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, Revision 1, September 1975 except for (1) personnel who perform the function of shift technical advisor shall hold an SRO license and have a bachelors degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents, (2) the operations manager who shall meet the requirements of ANSI N18.1-1971, except that NRC license requirements are as specified in TS 5.2.2.e, and (3) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be those previously reviewed and approved by the NRC, specifically those referenced in NMC letter dated March 19, 2003.

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).

ATTACHMENT D

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT
License Amendment Request dated March 19, 2003**

LIST OF COMMITMENTS

The following table identifies those actions committed to by NMC in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct question regarding these commitments to Mr. Gene Eckholt at Prairie Island Nuclear Generating Plant, (651) 388-1121.

REGULATORY COMMITMENT	DUE DATE
None	