

August 28, 2003

MEMORANDUM TO: Lakshminaras Raghaven, Section Chief  
Project Directorate III-1  
Division of Licensing and Project Management, NRR  
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FROM: David C. Trimble, Section Chief  
Operator Licensing and Human Performance Section  
Reactor Operations Branch (IROB)  
Division of Inspection Program Management, NRR

SUBJECT: SAFETY EVALUATION REGARDING UNIT STAFF QUALIFICATION  
REQUIREMENTS FOR KEWAUNEE NUCLEAR POWER PLANT;  
PALISADES NUCLEAR PLANT; POINT BEACH NUCLEAR PLANT,  
UNITS 1 AND 2 (MB8934, MB8935, MB8936, AND MB8937)

Plant Name: Kewaunee Nuclear Power Plant; Palisades Nuclear Plant; Point Beach  
Nuclear Plant, Unit 1 and 2

Utility: Nuclear Management Company, LLC

Docket Nos. 50-305, 50-255, 50-266, 50-301

TAC No.: MB8934, MB8935, MB8936, MB8937

Operating License: DPR-43, DPR-20, DPR-24, DPR-27

Project Manager: J. Lamb, J. Eads, D. Spaulding

Review Branch: IROB

Review Status: Complete

In a work request dated May 16, 2003, the Reactor Operations Branch (IROB) was asked to review the Nuclear Management Company, LLC (NMC) request to revise the Kewaunee Nuclear Power Plant; Palisades Nuclear Plant; Point Beach Nuclear Plant, Units 1 and 2 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 The change revises requirements that have been superseded based on licensed operator training programs being accredited by the National Academy for Nuclear Training and promulgation of the revised 10 CFR Part 55, "Operators' Licenses," which became effective on May 26, 1987.

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

The principal reviewer for this assessment was Richard Pelton. If you have any questions he can be reached at 415-1028. IROB considers its efforts on TAC Nos. MB8934, MB8935, MB8936, and MB8937 to be complete.

Attachment: As stated

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Attachment: As stated

Distribution:

Licensing Action/Admin Changes folder  
Generic Operator Licensing/License Eligibility  
John Lamb  
Johnny Eads  
Dierdre Spaulding

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DATE	08/27/03		08/28/03	

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SAFETY EVALUATION REGARDING UNIT STAFF QUALIFICATION  
REQUIREMENTS FOR KEWAUNEE NUCLEAR POWER PLANT;  
PALISADES NUCLEAR PLANT;  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2  
DOCKET NOS. 50-282 50-255, 50-266, and 50-301

1. INTRODUCTION

By letter dated April 30, 2003, Nuclear Management Company, LLC (NMC) submitted a technical specification change request for Kewaunee Nuclear Power Plant; Palisades Nuclear Plant; Point Beach Nuclear Plant, 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 National Academy for Nuclear Training (NANT) and the training accreditation process. 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 NMC will revise Kewaunee Nuclear Power Plant (KNPP); Palisades Nuclear Plant (PNP); Point Beach Nuclear Plant, Unit 1 and 2 (PBNP 1 and 2) Technical Specification (TS) Section 5.3 or 6.3, "Plant Staff Qualifications," as applicable for each plant. The requested revision will update requirements that have been outdated based on licensed operator training programs being accredited by the National Academy for Nuclear Training and promulgation of the revised 10 CFR 55, "Operators' Licenses." TS Section 5.3 and 6.3 describes the requirements for plant staff qualifications. These changes conform to the current requirements of 10 CFR 55. The TS requirements for all other plant staff qualifications remain unchanged.

The NRC staff concludes that the revised qualification requirements in TS Section 5.3 (PNP, PBNP 1 and 2) or 6.3 (KNPP) are adequate as 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 Palisades Nuclear Plant TS Section 5.3, "Plant Staff Qualifications," to Point Beach Nuclear Plant, Unit 1 and 2 TS Section 5.3, "Facility Staff Qualifications," and to Kewaunee Nuclear Power Plant TS Section 6.3, "Plant 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.