

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

April 14, 1980

Director of Nuclear Reactor Regulation
Attention: Mr. L. S. Rubenstein, Acting Chief
Light Water Reactors Branch No. 4
Division of Project Management
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Rubenstein:

In the Matter of the Application of) Docket Nos. 50-390
Tennessee Valley Authority) 50-391

In a letter dated March 29, 1980, from H. R. Denton, the NRC provided the revised criteria to be used in evaluating reactor operator training and licensing. It was stated in this letter that Commission review in the area of operator training and qualification is continuing and can be expected to result in additional criteria. Because of the uncertainty involved, we believe that a meeting should be held between the NRC and TVA to ensure that the qualification requirements for Watts Bar Nuclear Plant Reactor Operators (RO) and Senior Reactor Operators (SRO) are met.

As described in the enclosure, it is TVA's intent to involve Watts Bar license applicants in Sequoyah Nuclear Plant operations. Since a significant benefit to both plants can be gained by including Watts Bar candidates in Sequoyah's test program, we need to discuss our concerns as early as possible. We therefore request that a meeting be scheduled for either the week of April 14 to April 18, 1980, or the week of April 28 to May 2, 1980.

If you have any questions concerning this matter, please get in touch with David L. Lambert at FTS 854-2581.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills
L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
LICENSING AND TRAINING OF LICENSE CANDIDATES

Previous planning has been to train to meet the cold license requirements in effect before December 1979 as described in the FSAR. This involved minimum use of Sequoyah (SNP) because the schedules were running so close that Watts Bar could not count on getting the required observation time on Sequoyah. As a result, almost all of the Watts Bar candidates now meet the same criteria as SNP cold license candidates except for the four weeks of license preparation and review.

During the SNP plant licensing phase, it became apparent that the December 6, 1979, draft of ANS 3.1 contained new requirements which might have to be met. Therefore, Watts Bar has started a rotation experience program, consistent with ANS 3.1, whereby all of our RO and SRO candidates will get as much time as possible during the test program and at least two months above 20 percent power engaged in operator activities.

We propose a new approach for the Watts Bar cold license requirements. The assistant superintendent, assistant operations supervisor, three shift engineers, and four assistant shift engineers should be cold licensed at Sequoyah and should perform the licensed duties for approximately six months. Among the reasons for this approach are:

1. The experience will help Watts Bar do a better job during startup.
2. The need for "consultants" with operating experience such as SNP had to have should be eliminated.
3. There is some concern that future cold license or hot license SRO's will have to have about six months time as RO's.
4. It would help to ease SNP's overtime burden.

If NRC agrees with this approach, we propose the following:

1. Temporarily stop Watts Bar rotation program for SRO candidates at Sequoyah.
2. Put these nine individuals immediately into license preparation--refresher training for SRO with expectation of licensing in ten weeks.
3. Put these individuals into regular shift work at SNP until November 1, 1980.
4. Return them to Watts Bar on November 1, 1980, to participate in hot functional testing and the remaining preoperational tests.
5. Rotate the remaining SRO applicants through SNP after November 1, 1980, for at least two months experience above 20 percent power to meet as many of ANS 3.1 requirements as possible.
6. Continue to rotate RO applicants through SNP as planned during startup testing and power operation.