

August 26, 2009

Document Control Desk
US Nuclear Regulatory Commission
Washington, DC 20555

RE: Docket 50-27

Dear Sir:

During the USNRC inspection beginning on August 24, 2009, inspector Craig Bassett noticed that the USNRC had not received a letter adding section 2.c to the WSUNRC Requalification Plan, dated January 17, 2008. The original letter is attached explaining the need for such a clarification to the annual operations section in the WSUNRC Requalification Plan.

Sincerely,

Donald Wall

Donald Wall
Director

Enclosures

cc: Linh Tran, Project Manager
Craig Bassett, Inspector

M003
A020
NRR

January 17, 2008

John T. Nguyen
Project Manager
Mail Stop 012 G15
US Nuclear Regulatory Commission
Washington, DC 20555

Mr. Nguyen,

As a follow up to an unresolved item from our last inspection (URI 50-027/2007-201-01) and an event on June 30, 2006, the Washington State University Nuclear Radiation Center (WSUNRC) has made corrective changes to the facilities' Requalification Plan. A complete copy of the updated Requalification Plan is included.

The plan shall be changed as follows:

Section 2 "Annual Operations Test" adds subsection "c" to read:

"c. Operators who do not meet the 15 month requirement shall take the annual operations test as soon as practically possible. In addition, the operator in question shall receive documented training on the WSUNRC Requalification Plan and 10 CFR 55.59".

In addition, there are several clerical errors that have been fixed that do not change the scope or impact of the plan. The newest revision of the Requalification Plan shall be dated January 16, 2008.

Sincerely,



Dr. Donald Wall, Director

Cc: Craig Basset, USNRC Region II
USNRC Document Control Desk
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REACTOR STAFF REQUALIFICATION PROGRAM

Each licensed reactor operator and senior operator at the Washington State University Nuclear Radiation Center reactor facility will participate in the reactor staff requalification program as outlined below, with the exception that the senior reactor operator who is in charge of the program will be exempted from taking the written examinations.

1. Biennial Written Requalification Exam

Licensed operators and senior operators will biennially take a facility prepared RO or SRO written exam administered by the requalification program director just prior to submitting the request for renewal of these licenses. This exam will be broken down into sections in accordance with the subjects set forth in 10 CFR 55.41 for the RO exam and 55.43 for the SRO exam as applicable to a non-power reactor. Sections of this exam may be administered over a period of time not to exceed one month and any individual who does not received a grade of 70% or higher on any section will be given additional training and/or tutorial lectures and then be reexamined. Individuals who receive a grade of less than 70% on any one section will not be allowed to actively participate in reactor operations until they have received additional training and successfully pass a second exam in that subject area. An overall grade of 70% for the entire exam will be considered as a passing mark.

2. Annual Operations Test

- a. An annual operations test shall be administered to each RO and SRO at intervals not to exceed 15 months in order to meet the requirements of 10 CFR 55.59
 - (a.2.ii). The operations test shall consist of the following elements:
 - 1. Checkout and startup of the reactor.
 - 2. Bringing the reactor up to full power.
 - 3. Reducing the reactor power and leveling off at 50% power.
 - 4. Responding to an alarm situation.
 - 5. Shutting down the reactor.
- b. Records of the annual operations test must be maintained and any individual who fails shall be given additional training and then retested.
- c. Operators who do not meet the 15 month requirement shall take the annual operations test as soon as practically possible. In addition, the operator in question shall receive documented training on the Washington State University Nuclear Radiation Center Requalification Plan and 10 CFR 55.59.

3. Biennial Operations Requirement

In accordance with the recommendations of ANSI/ANS-15.4, over a two-year period, each licensee in the requalification program shall perform at least ten reactivity manipulations in any combination of reactor startups, shutdowns, or significant reactivity changes. To remain qualified to do pulsing an operator must do at least one pulse semiannually. An operator who does not meet this requirement must do his next pulse

under the supervision of an SRO. Direct supervision of these operations shall be considered equivalent to actual performance for the senior reactor operator. The quarterly operations certification is designed to insure that the biennial operations requirements are met.

4. Quarterly Operations Certification

Each licensed reactor operator and senior operator must actively participate in the operations of the facility in order to remain qualified. The minimum quarterly operations required are listed below.

a. Reactor Operators (personally perform)

- i) One complete reactor checkout and startup, including bringing the reactor up to full power.
- ii) One shutdown from full power.
- iii) Four hours of reactor operation time.

b. Senior Operators (directly supervise or personally perform)

- i) One complete reactor checkout and startup, including bringing the reactor up to full power.
- ii) One shutdown from full power.
- iii) Four hours of reactor operation time.

c. Each individual who fails to perform the above minimum operations in any one quarter shall be considered to be unqualified to perform his license duties. In

order to be requalified, an individual must be administered the equivalent of an operating test and six hours of supervised reactor operation time.

5. Facility and Safety Reviews

- a. All the following listed items will be promptly routed to each licensed operator and senior operator in the facility. Each licensee will be required to read this information and sign a routing slip indicating that he has done so.
 - i) Facility design changes.
 - ii) Technical specification changes.
 - iii) Facility license changes.
 - iv) Standard operating procedure changes.
- b. Each licensed operator and senior operator shall annual review all the current standard and emergency procedures of the facility. A form indicating that this has been done shall be maintained in the individual's training file.

6. Training Records

A training record file shall be maintained which shall indicate the performance of each licensed individual in the requalification program. The training records for each individual shall be maintained for a period of not less than two years and may be disposed of after an individual's license has been renewed. This record shall contain at least the following information:

- a. Performance on each section of the requalification program exam, including the actual exams and answers given by each licensee.
 - b. Special lectures, attended as a result of failure to pass a written requalification exam and results of reexamination.
 - c. Quarterly certification forms.
 - d. Results of annual operations test.
 - e. Facility and Safety Review signed routing slips.
 - f. Biennial performance review.
7. The Training Program supervisor for the Nuclear Radiation Center shall biennially review the performance of each licensed reactor operator and senior operator to ensure his competence to perform the activities for which he is licensed. This review shall include but not be limited to the following considerations:
- a. Performance on the written requalification exam.
 - b. Results of quarterly operations certifications.
 - c. Results of annual operations test.
 - d. Attitude toward following standard procedures and performing operations in a safe manner.
 - e. General overall performance of the individual as to how well he has performed his license responsibilities in a safe and competent manner.