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 RECIP NAME: EISENHUT, D. G. RECIPIENT AFFILIATION: Division of Licensing

SUBJECT: Forwards revised hot license training program utilizing simulator & operator requalification program in response to NUREG-0737 post TMI requirement for immediate upgrading of reactor operator qualifications.

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WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305

April 1, 1981

Mr. Darrell G. Eisenhut, Director
 Division of Licensing
 Office of Nuclear Reactor Regulation
 U. S. Nuclear Regulatory Commission
 Washington, D. C. 20555



Dear Mr. Eisenhut:

Docket 50-305
 Operating License DPR-43
 Kewaunee Nuclear Power Plant
NUREG 0737: Post TMI Requirements

- References:
1. D. G. Eisenhut's letter of October 31, 1980 to All Licensees transmitting NUREG 0737.
 2. Letter from E. R. Mathews to D. G. Eisenhut dated March 9, 1981.
 3. Letter from E. R. Mathews to H. R. Denton dated February 27, 1981.

Item I.A.2.1 of NUREG 0737 required the immediate upgrading of Reactor Operator (RO) and Senior Reactor Operator (SRO) qualifications. Included in that requirement were recommended revisions to Hot License Training and Requalification Programs. In reference 2 we stated that our revised programs would be submitted on this date. Accordingly, the revised Kewaunee Nuclear Plant Hot License Training Program Utilizing a Simulator and the revised Kewaunee Operator Requalification Program are being submitted with this letter.

In addition to the changes specifically requested in NUREG 0737, we have taken this opportunity to update the above named training programs, making both substantive and incidental (such as correcting typographical errors or revising specific phrases to clarify, but not change, intent) changes. The substantive changes to our operator training and requalification programs are described below. All changes have been made in accordance with the provisions of 10CFR50.54(i-1) and 10CFR50.59.

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Kewaunee Nuclear Power Plant Hot License Training Program Utilizing a Simulator

Discussion of Changes

- Section 3. The educational requirements have been revised to incorporate the requirements specified in NUREG 0737.
- Section 5. The reference to plant procedures has been updated to reflect their current status.
- Section 6. The lecture subjects have been revised to include Heat Transfer, Fluid Flow, and Thermodynamics and Training in the use of installed plant systems to control or mitigate an accident in which the core is severely damaged. The latter subject area, as discussed in reference 2, is currently treated on a general basis and will be augmented with pertinent subject material as that material becomes available through other related efforts (such as reactor vessel level development).
- Section 7. Paragraph 7.4 has been added to indicate that the simulator will be used to meet reactivity manipulation requirements.

Kewaunee Operator Regualification Program

- Section 5. The general subject categories have been revised to include Heat Transfer, Fluid Flow, and Thermodynamics and Training in the use of installed plant systems to control or mitigate an accident in which the core is severely damaged. The latter subject area, as discussed in reference 2, is currently treated on a general basis and will be augmented with pertinent subject material as that material becomes available through other related efforts.

Section 5.8 has been revised to show the typical schedule for addressing each subject.

- Section 6. Paragraph 6.1.2 has been revised to include a more extensive list of examples of reactivity control manipulations and plant evolutions in accordance with the direction given in reference 1, Item I.A.2.1.

Paragraph 6.2 has been deleted from the program. We feel that the on-shift Group Discussion is no longer a viable means of requalification training. Subject areas previously covered by the on-shift group discussions will be addressed in classroom sessions or individual study.

Mr. D. G. Eisenhut
April 1, 1981
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Section 7. Paragraph 7.1.3 has been revised to allow the annual requalification examination to be given on a more flexible schedule, prior to the commencement of the next annual formal session. The previous wording was over-restrictive in requiring the exam to be given "in the spring adjusted around refueling outages" often causing conflicts with startup activities.

Paragraph 7.1.3 has also been revised to allow the annual examination to be given in a 14 day period, rather than a seven day period. This will allow more flexibility in the administration of the exam without unduly taxing the operating crews.

Section 8. The paragraphs of Section 8 have been revised to require a minimum passing grade of 80 percent on the annual examinations.

Item III.A.2 of NUREG 0737 presented new requirements in the area of emergency preparedness. In reference 3, we stated that a conceptual design for the Public Notification System would be provided to the NRC for concurrence. We would like to take this opportunity to provide you with an update in this regard. Wisconsin Electric Power Company has taken the lead role in the joint project to provide the Public Notification System. Evaluation of the proposals received is continuing and detailed information is not available.

Item III.D.3.4 of NUREG 0737 requested information on Control Room Habitability. In reference 2, we stated that our architect engineer was performing that review and we expected completion by March 31, 1981. This is to notify you that we received the results of their review last week. We are currently evaluating their report and will provide the results of the control room habitability review to the staff when our review is complete. We anticipate submittal of this information by April 20, 1981.

Very truly yours,

*ChR Jerome
for*

E. R. Mathews, Vice President
Power Supply & Engineering

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Attach.

cc - Mr. Paul Collins, Chief, Operating License Branch
US NRC, Washington, D C 20555
Mr. Robert Nelson, NRC Resident Inspector
RR #1, Box 999, Kewaunee, WI 54216