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SUBJECT: Notification of changes to shift technical advisor program,  
 implementing prior to leaving cold shutdown condition  
 following 1992 refueling outage.

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March 30, 1992

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Changes to Shift Technical Advisor (STA) Program

- References:
- 1) Letter from E. R. Mathews (WPSC) to D. G. Eisenhut (NRC) dated January 5, 1981
  - 2) Letter from S. A. Varga (NRC) to E. R. Mathews (WPSC) dated January 25, 1982
  - 3) Letter from S. A. Varga (NRC) to E. R. Mathews (WPSC) dated July 10, 1981

In Reference 1, Wisconsin Public Service Corporation (WPSC) submitted an outline of the Kewaunee Nuclear Power Plant (KNPP) STA Program. Reference 2 provided NRC acceptance of KNPP's program. This letter provides notification of changes to the STA program, which will be implemented prior to leaving the cold shutdown condition following the 1992 refueling outage. The major changes are listed below:

1. Currently, KNPP has 14 part-time STAs standing a rotating 24-hour duty. This will be changed to 6 full-time STAs on rotating shifts.
2. The prerequisite requirement for 18 months of experience in the operation or engineering support of a nuclear power plant, prior to serving as an STA, was changed to 12 months. This is consistent with INPO Guidance for this position.

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3. STA trainees will be able to test out of the power plant fundamentals training sections by passing the applicable sections of the Generic Fundamentals Examination Section (GFES) of the operator licensing exam.
4. Power plant fundamentals and plant systems and components training for STAs will be taught with the Reactor Operator (RO) trainees when possible.
5. STA requalification training will be accomplished with the Operations crews, with the exception of topics that are specific to the STA position.
6. STAs will be encouraged to obtain SRO certification.

WPSC has reviewed these changes and has concluded that the revised program continues to meet KNPP Technical Specifications 6.2.2.h and 6.3.2, and the specific requirements of Item I.A.1.1 of Reference 3. The revised program strengthens the STA position by allowing more interaction with the Operations Department and exposing the STAs to more detailed information on the design and operation of the plant.

The KNPP STA program received INPO accreditation in October, 1986, and accreditation was renewed in December, 1989 and in December, 1990. The revised program meets the latest INPO Guidance, INPO 90-003, January, 1990, "Guidelines for the Training and Qualification of STAs". These guidelines are broader in scope than the original INPO guidelines "Nuclear Power Plant Shift Technical Advisor - Recommendations for Position Description, Qualifications, Education and Training", dated April 30, 1980, and were revised utilizing job and task analyses methods.

Please direct any comments or questions to Mr. Dave Lohman at (414) 388-2560, Ext. 2368.

Sincerely,



C. A. Schrock  
Manager - Nuclear Engineering

BJD