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 Office of Nuclear Reactor Regulation, Director (Post 870411)

SUBJECT: Forwards Rev C to O-LRQ-TP, "Licensed Operator
 Requalification Training Program." Program recently recieved
 accreditation from INPO. Sections 6.1.1, 6.3.2 & 6.3.3 include
 exemptions decreasing frequency in conducting program.

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April 28, 1987

10 CFR 50.54(i)

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Revision to Licensed Operator Requalification Program

Reference: 1) Letter from E. R. Mathews to D. G. Eisenhower dated April 1, 1981

Wisconsin Public Service Corporation (WPSC) has revised and upgraded several training programs as required by our commitments to the Nuclear Regulatory Commission (NRC) regarding accreditation of training programs through the Institute of Nuclear Power Operations (INPO). WPSC recently received full accreditation from the INPO Accreditation Board for several licensed operator training programs including Program O-LRQ-TP entitled, "Licensed Operator Requalification Training Program."

10 CFR 50.54(i) states that "the licensee shall not, except as specifically authorized by the Commission, make a change in an approved operator requalification program by which the scope, time allotted for the program or frequency in conducting different parts of the program is decreased."

Training program O-LRQ-TP has been reviewed to ensure that any changes that could lead to a decrease in the scope, time allotted or frequency in the program are identified. We hereby submit in accordance with 10 CFR 50.54(i) our licensed operator Requalification Training Program which was recently accredited by INPO. Sections 6.1.1, 6.3.2 and 6.3.3 include revisions that provide exemptions which could be interpreted to be a decrease in the frequency in conducting different parts of the program. We therefore submit the program in accordance with 10 CFR 50.54(i) for your review and approval.

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The exemption which is now included as Section 6.1.1 of the program enables a currently licensed reactor operator (RO) to participate in a Senior Reactor Operator (SRO) training program without concurrently requiring participation in the RO requalification training program. This exemption applies if the NRC upgrade license examinations are scheduled to be taken within six (6) months prior to or following the next scheduled RO requalification examinations (written and/or operational). Since the SRO training program covers details to a level at or beyond those required by the RO requalification program, requiring individuals who are participating in the SRO program to concurrently participate in the RO requalification program is unwarranted.

Section 6.3.2 addresses an exemption for individuals who have recently passed a reactor operator or senior reactor operator license examination. The exemption provides relief from requiring a licensed operator to participate in either a RO or SRO requalification examination within six months following demonstration of their knowledge, skills, and abilities on an NRC administered RO, SRO upgrade or Instant SRO examination. If the individual recently (within six months) has demonstrated his/her abilities in a comprehensive NRC administered operator license examination, it is an unwarranted burden on the operator to again demonstrate his/her abilities in a requalification examination.

Similarly, section 6.3.3 has been added to the program to provide an exemption for a licensed RO who is participating in the SRO upgrade training program. The change allows an RO to not participate in the next scheduled RO requalification examinations if he/she is scheduled to take a NRC upgrade (SRO) license examination within six months following the next scheduled licensed Operator Requalification Examinations.

A licensed RO who is participating in the comprehensive SRO training program is receiving training to a level at or above that required of a licensed RO. Since the individual is scheduled to demonstrate his/her knowledge in a NRC administered SRO license examination within six months, the requirement to participate in RO requalification exams while participating in the SRO training program is unwarranted. Since maintenance of a valid reactor operator license requires participation in a requalification program including exams, the exemption is necessary to ensure that the RO license remains valid during the time that the operator is participating in the SRO training program. In addition any individual who is exempt from taking the RO requalification examinations during SRO upgrade and subsequently is unsuccessful on the NRC administered SRO upgrade examinations shall be administered a Licensed Operator Requalification Examination which covers, as a minimum, those related areas where the individual was unsuccessful. This examination shall be administered within thirty (30) days of official notification of failure on the NRC upgrade license examination and will be evaluated as assurance of continued RO qualifications.

The purpose of all of the above referenced changes is to limit the amount of double testing of a licensed operator. The exemptions provide for a maximum of 1½ years between an initial NRC administered licensed operator examination and the appropriate requalification examination. The exemptions are provided only in those instances where a comprehensive NRC examination has recently been or will shortly be administered.

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The NRC recently administered several RO and SRO examinations to WPSC personnel during the week of February 17, 1987. WPSC intends to utilize the exemptions in sections 6.1.1, 6.3.2, and 6.3.3 of the referenced training program for the personnel recently administered NRC exams in February of 1987. The exemption relieves these individuals from participating in requalification written and operational examinations, as appropriate. These examinations are scheduled during the month of May 1987. It is unreasonable to expect these individuals to participate in requalification examinations three months after taking and passing the NRC examinations. Since the requalification examinations for licensed personnel are scheduled during May of 1987, your prompt review and approval is requested. We will maintain communications with our NRC Project Manager in an effort to resolve this issue expeditiously.

To aid in your review of the attached program we wish to inform you that the licensed operator training program was last submitted to NRC for review and approval on April 1, 1981 (reference 1). Attached is a check in the amount of \$150 as required by 10 CFR 170.12.

Sincerely,

Charles A. Hintz for

D. C. Hintz
Vice President - Nuclear Power

DSN/jms

Attach.

cc - Mr. Robert Nelson, US NRC
US NRC, Region III