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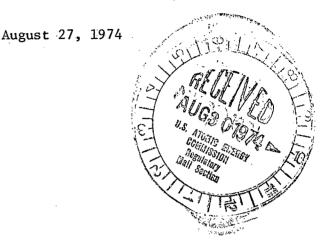
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WISCONSIN PUBLIC SERVICE CORPORATION



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



Mr. Paul F. Collins, Chief Operator Licensing Branch Directorate of Licensing U. S. Atomic Energy Commission Washington, D. C. 20545

Dear Mr. Collins:

Subject: Operator Requalification Program Docket 50-305 Operating License DPR-43

Reference your telecon (Mr. Holman) of August 26, 1974, we

hereby submit revised pages to the program which further describe the operator requalification program.

Very truly yours,

E. W. James

Senior Vice President Power Generation & Engineering

EWJ:sna Attachment: Kewaunee Operator Requalification Program Revised Pages

cc - Mr. Steven E. Keane



6.3 Individual Study

| 6.3.1 | During the course of the requalification period, each licensed | | | | | | | |
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| | operator shall be responsible for pursuing individual study. | | | | | | | |
| | Individual study will supplement the formal sessions and group | | | | | | | |
| | discussions in that it is expected that the material to be | | | | | | | |
| | covered in these sessions will be reviewed in advance by all | | | | | | | |
| | licensed operators and, if necessary, afterwards. By means of | | | | | | | |
| | individual study, each licensed operator is also afforded the | | | | | | | |
| | opportunity to concentrate on specific areas of weakness. | | | | | | | |

- 6.3.2 Individual study will include a systematic review of all design, procedure and facility license changes. Descriptions of these changes will be routed to each licensed operator by the Plant Administrative Assistant.
- 6.3.3 As a general guideline, each licensed operator and Shift Supervisor should schedule at least an average of four (4) hours of individual study per week; while Staff licensed personnel should schedule an average of eight (8) hours per month.
- 6.3.4 Individual study is an individual responsibility. Except as specified in paragraph 10.1.c, no documentation of individual study is planned.

7.0 EVALUATION

- 7.1 Annual Examination
 - 7.1.1 An annual examination comparable to an A.E.C. examination for the type of license held shall be part of the requalification program.
 - 7.1.2 The annual written examination will be used for the following purposes:
 - a. To determine specific subject matter to be discussed in the formal sessions and group discussions.
 - b. To determine need for participation in an accelerated requalification program (Ref. paragraph 8.0).
 - c. To determine that an individual may be excused from attendance at formal sessions covering specific subject matters. A grade of at least 80% must be achieved to permit being excused from attendance.

(Note: In accordance with paragraph 5.5, this option will not be available for the first regualification program.)

7.1.3 In order for this examination to be effective, it should be given at one time to all licensed personnel. However, this is quite incompatible with the necessity to operate the plant with personnel on rotating shifts. Therefore, the exam will be given in its entirety during the week that the individual is scheduled for training.

7.2 Periodic Examination

- 7.2.1 Periodic written examinations will be administered to all requalification program participants. These examinations will indicate each person's knowledge of subject matter covered in the formal sessions and group discussions.
- 7.2.2 A minimum of two (2) examinations of this type per year will be scheduled.
- 7.2.3 Each licensed operator must achieve a grade of at least 80% on the periodic examination. Individuals not achieving this minimum grade will be required to participate in remedial training in the appropriate subject areas. The details of remedial training will be determined on a case basis.

7.3 Performance Observation and Evaluation

- 7.3.1 Each licensed operator will be observed and evaluated to determine his overall ability to perform activities for which he is licensed. Each individual will be observed performing or simulating as many normal operations and coping with as many abnormal and emergency situations as is practical consistent with actual plant operation and the availability of qualified observers.
- 7.3.2 As a minimum, each licensed operator will be observed and evaluated once per year.
- 7.3.3 The details of this portion of the requalification program have not been completely formulated. As the program progresses and these details have been finalized, this program will be revised accordingly, and submitted to the AEC for review.

8.0 ACCELERATED REQUALIFICATION PROGRAM

- 8.1 Participation in an accelerated requalification program will be required of each licensed operator who receives a score of less than 70% on the annual examination.
- 8.2 This program will be developed to serve the needs of the particular individual. At the completion of the program, an examination covering the weak areas will be given. A score of 70% or better will indicate successful completion of the accelerated program.
- 8.3 Licensed operators who are required to participate in an accelerated requalification program shall not be permitted to perform licensed duties until he has successfully completed this program.

9.0 SIMULATOR TRAINING

- 9.1 It has not been established whether or not to utilize a simulator as part of the Kewaunee Plant requalification program. If it is established that a simulator will be used, a definitive program will be prepared describing the type of training and the amount of time to be spent on the simulator, and submitted to the AEC for review.
- 9.2 In the event a simulator is utilized, we intend to take credit for operations which fulfill the requirements of paragraphs 6.1 (Reactivity Control Manipulations). We will also consider the simulator operations to have significantly supplemented the group discussions in the areas outlined by paragraph 6.2.4.

10.0 RECORDS

- 10.1 The following records of the requalification program will be maintained:
 - a. Annual and periodic examinations and each licensed operator's answers to these examination questions.
 - b. Documentation indicating that each licensed operator has reviewed the contents of abnormal and emergency procedures.
 - c. Documentation indicating that each licensed operator has reviewed facility design, procedure and facility license changes.
 - d. Details and results of any accelerated and/or remedial requalification programs conducted.
 - e. Results of observations and evaluations performed on each licensed operator, including any deficiencies in the individual's training results.
 - f. Documentation indicating that group discussions were held, including attendance and subject matter discussed.