

FILE:

FROM: Wisconsin Public Service Corp Green Bay, WI E. W. James		DATE OF DOC 8-8-74		DATE REC'D 8-12-74		LTR X	TWX	RPT	OTHER
TO: Paul F. Collins		ORIG 1 signed		CC OTHER		SENT AEC PDR XXX SENT LOCAL PDR XXX			
CLASS	UNCLASS	PROP INFO	INPUT	NO CYS REC'D 1		DOCKET NO: 50-305			
DESCRIPTION: Ltr re our 7-9-74 ltr trans the following.....				ENCLOSURES: Rev Operator Requalification Program..... DO NOT REMOVE ACKNOWLEDGE (1 cy encl rec'd)					
PLANT NAME: KEWAUNEE									

FOR ACTION/INFORMATION 8-13-74 GMC

BUTLER (L)	✓ SCHWENCER (L)	ZIEMANN (L)	REGAN (E)
W/ CYS	W/ 5 CYS <i>info</i>	W/ CYS	W/ CYS
CLARK (L)	STOLZ (L)	DICKER (E)	✓ COLLINS
W/ CYS	W/ CYS	W/ CYS	W/ 2 CYS
TARR (L)	VASSALLO (L)	KNIGHTON (E)	
W/ CYS	W/ CYS	W/ CYS	W/ CYS
KNIEL (L)	PURPLE (L)	YOUNGBLOOD (E)	
W/ CYS	W/ CYS	W/ CYS	W/ CYS

INTERNAL DISTRIBUTION

✓ <u>REG FILE</u>	TECH REVIEW	DENTON	LIC ASST	A/T IND
AEC PDR	HENDRIE	GRIMES	DIGGS (L)	BRAITMAN
OGC	SCHROEDER	GAMMILL	GEARIN (L)	SALTZMAN
MUNTZING/STAFF	MACCARY	KASTNER	✓ GOULBOURNE (L)	B. HURT
CASE	KNIGHT	BALLARD	KREUTZER (E)	
GIAMBUSSO	PAWLICKI	SPANGLER	LEE (L)	<u>PLANS</u>
BOYD	SHAO		MAIGRET (L)	MCDONALD
MOORE (L)(LWR-2)	STELLO	<u>ENVIRO</u>	REED (E)	CHAPMAN
DEYOUNG (L)(LWR-1)	HOUSTON	MULLER	SERVICE (L)	DUBE w/input
✓ SKOVHOLT (L)	NOVAK	DICKER	SHEPPARD (L)	E. COUPE
✓ GOLLER (L)	ROSS	KNIGHTON	SLATER (E)	
P. COLLINS	IPPOLITO	YOUNGBLOOD	SMITH (L)	D. THOMPSON (2)
DENISE	TEDESCO	REGAN	TEETS (L)	KLECKER
✓ <u>REG OPR</u>	LONG	PROJECT MGR	WILLIAMS (E)	EISENHUT
FILE & REGION (3)	LAINAS		WILSON (L)	
MORRIS	BENAROYA	HARLESS		
STEELE	VOLLMER			

EXTERNAL DISTRIBUTION

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✓ 1 - TIC (ABERNATHY)	1-ASLBP(E/W Bldg, Rm 529)	1-BROOKHAVEN NAT LAB
✓ 1 - NSIC (BUCHANAN)	1-W. PENNINGTON, Rm E-201 GT	1-G. ULRIKSON, ORNL
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✓ 16 - ACRS HOLDING	NEWARK/BLUME/AGBABIAN	1-RD. MUELLER, Rm F-309
SENT TO LIC ASST GOULBOURNE 8-13-74		GT

WISCONSIN PUBLIC SERVICE CORPORATION



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

August 8, 1974

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

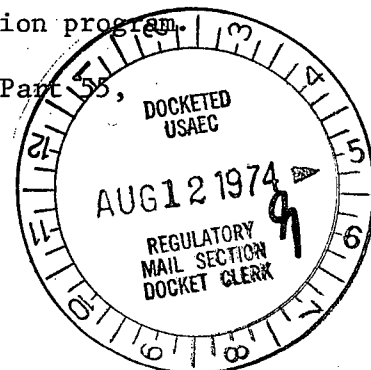


Reference your letter of July 9, 1974, we hereby submit a revised program which describes the operator requalification program. We believe this program meets the requirements of 10 CFR Part 55, Appendix A.

Very truly yours,

A handwritten signature in cursive script, appearing to read "E. W. James".

E. W. James
Senior Vice President
Power Generation & Engineering



EWJ:sna
Attachment: Kewaunee Operator
Requalification Program

cc - Mr. Steven E. Keane, W/A

REGULATORY DOCKET FILE COPY

8302

KEWAUNEE OPERATOR REQUALIFICATION PROGRAM

1.0 PURPOSE

The Operator Requalification Program is a requirement of Appendix A, 10 CFR 55, designed to ensure that all licensed Reactor Operators and Senior Reactor Operators maintain the proficiency to continue to operate the Kewaunee Nuclear Power Plant safely, efficiently and within the requirements of the Technical Specifications.

2.0 APPLICABILITY

This program applies to all licensed Reactor Operators and Senior Reactor Operators who are required or intend to maintain a current, valid license.

3.0 REFERENCES

3.1 10 CFR 50.54 (i) (i-1)

3.2 10 CFR 55, Appendix A - Requalification Programs for Licensed Operators of Production and Utilization Facilities.

3.3 ACD 13.3 - Operator Training

4.0 PROGRAM SCHEDULE

4.1 Each requalification program is established to span a two-year period. Promptly upon termination of one program, a successive program will commence, consistent with the time of year and operational status of the plant at the time of program termination.

4.2 In general, the formal sessions specified by this program shall be conducted during the months of October through April. The months May and September are contingency months available for postponed or additional formal sessions as may be required. The months June, July and August are reserved for vacations; no formal sessions will be scheduled in this period, although individual study will be encouraged.

4.3 On-the-job training which is conducted mostly on shift will be scheduled continuously. It is not expected that vacations will affect this portion of the retraining program significantly.

4.4 The general schedule of formal sessions is specified in paragraph 5.8.

5.0 FORMAL SESSIONS

5.1 It is our belief that, since all licensed personnel have received in-depth, initial training in the various subject areas while preparing for license exams, the traditional lecture approach for many of the formal requalification sessions planned would be inappropriate. Since

5.1 (Continued)

most of the formal requalification sessions will be a review of material, we believe that a well disciplined seminar format would prove more beneficial because, in participating, rather than merely listening, the individuals will be more encouraged to keep their mind actively applied to the subject matter under discussion.

Therefore, we intend to employ either the seminar or lecture format as appropriate for each of the formal requalification program sessions. In either case, an instructor will be present with organized, pre-planned subject matter to either deliver or use as the basis for discussion or question and answer period.

- 5.2 Each operating crew will participate in the formal requalification sessions while on relief shift. Each session will, therefore, be repeated five times. In this manner, the schedular provisions of paragraph 4.2 will permit a minimum of six formal sessions per year per crew.
- 5.3 The general subject categories of the formal requalification sessions are as follows:
 - 5.3.1 Reactor Theory and Principles of Plant Operation
 - 5.3.2 Plant Major Fluid Systems (includes Engineered Safety Systems) and Facility Design
 - 5.3.3 Instrumentation, Control and Protection Systems
 - 5.3.4 Electrical Distribution and Control Systems
 - 5.3.5 Plant Operating Characteristics
 - 5.3.6 Normal, Abnormal and Emergency Operating Procedures
 - 5.3.7 Technical Specifications
 - 5.3.8 Radiation Monitoring and Health Physics
 - 5.3.9 Applicable Portions of Title 10, Chapter 1, Code of Federal Regulations
- 5.4 The specific subject matter to be covered in the formal sessions will be determined primarily by the results of the annual examination discussed in paragraph 7.1.
- 5.5 Attendance at the formal sessions will be required of all licensed personnel during the initial requalification program. As the initial program progresses and is evaluated, it will be determined whether or not to implement a policy of permitting individuals to be excused from formal sessions based on annual examination results. Record of attendees will be maintained, reviewed and discussed with management periodically.

- 5.6 The Kewaunee Plant presently has a very extensive library of video tapes which will be utilized in the formal sessions, as required. However, no more than one-half of the formal sessions will consist of these tapes or other films.
- 5.7 During the formal sessions, the background and reasons behind design, procedure and facility license changes will be discussed as time permits. This will supplement the group discussion coverage of these changes and help to insure that the licensed personnel have a thorough understanding of these changes.
- 5.8 The following is the preliminary schedule of formal sessions. This schedule may be changed to accommodate special needs indicated by the annual examination. The term "period" refers to the five (5) week time period corresponding to one rotating shift cycle.

<u>Period</u>	<u>Subject</u>
1 and 2	Reactor Theory and Principles of Operation
3 and 4	Plant Fluid Systems and Facility Design
5 and 6	Instrumentation, Control and Protection Systems
7	Electrical Distribution and Control Systems
8	Plant Operating Characteristics
9	Plant Operating Procedures
10	Technical Specifications
11	Radiation Monitoring and Health Physics
12	Applicable portions of Title 10, Chapter 1, Code of Federal Regulations

6.0 ON-THE-JOB TRAINING

6.1 Reactivity Control Manipulations

- 6.1.1 Each licensed operator will be required to manipulate the plant controls during at least ten (10) significant reactivity control manipulations during the course of each two year requalification period. Each senior licensed operator will be required either to manipulate the plant controls or direct the activities of licensed operators during at least ten (10) significant reactivity control manipulations during the course of each two year requalification period.

6.1.2 The following activities are considered to be significant reactivity control manipulations:

- a. Reactor startup to the point of adding heat
- b. Orderly reactor shutdown
- c. Manual control of steam generator level during startup or shutdown
- d. Operation of the turbine EH control panel during startup
- e. Boration of reactor coolant system
- f. Dilution of reactor coolant system
- g. Operation (or direction of operation for SRO) of manipulator crane in the core area during refueling. A minimum of four (4) fuel elements must be taken into, removed from or transferred from one location to another in the core in order to take credit for this manipulation.
- h. Any power change in excess of 10% with rod control in manual
- i. Manual rod control prior to and during generator synchronization

6.1.3 During each two year requalification period, every effort will be made to have each licensed operator perform (or direct--as applicable) a combination of control manipulations as outlined in 6.1.2 above. In any one requalification period, credit will not be taken for more than two (2) manipulations of the same type per person.

6.2 Group Discussions

- 6.2.1 Group discussion sessions will be scheduled periodically during the entire requalification period. For shift personnel, these group discussions will occur on shift and be led by the Shift Supervisor. For the licensed Staff personnel, these group discussions will occur during normal working hours and be led by one member of that group.
- 6.2.2 The subject matter to be discussed will be determined by the group leader based on his knowledge of his personnel and judgment. This determination will also be influenced by the individual's results on the annual examination and the desire of the Plant Superintendent or his authorized representative in training matters to cover certain topics.
- 6.2.3 A minimum of one (1) group discussion session for each shift crew and the day shift licensed personnel shall be scheduled every five (5) weeks. More discussions can be scheduled if the need arises.
- 6.2.4 The objective of the group discussions will be the following:
 - a. To review the operation of systems, mechanisms and apparatus of the plant.
 - b. To review the normal and abnormal operating procedures associated with these systems, mechanisms and apparatus.
 - c. To review all normal and emergency operating procedures at least once per requalification program.

6.3 Individual Study

- 6.3.1 During the course of the requalification period, each licensed 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.

(Note: In accordance with paragraph 5.5, this option will not be available for the first requalification 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, several alternative approaches to the details of scheduling this examination are presently under consideration. When the exact course of action has been determined, this program shall be revised accordingly, outlining the approach to be taken for this requalification program.

7.2 Periodic Examinations

- 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 requalification program.
- 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.

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.
- 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.