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 RECIP.NAME RECIPIENT AFFILIATION
 DAVIS,A.B. Region 3, Ofc of the Director

SUBJECT: Requests that Section B of Confirmatory Action Ltr
 CAL RIII-90-013 be modified to permit reloading fuel.

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Iowa Electric Light and Power Company

August 6, 1990
NG-90-1941

Mr. A. Bert Davis
Regional Administrator
Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Re: Duane Arnold Energy Center
Docket No: 50-331
Op. License DPR-49

Subject: Modification to Confirmatory
Action Letter (CAL RIII-90-013)

Dear Mr. Davis:

This letter requests a modification of the Confirmatory Action Letter dated July 13, 1990 (CAL RIII-90-013). As we explained to your staff during a telephone conference on August 2, 1990, we request that Section B of the CAL be modified to permit reloading fuel into the reactor before the Operations Evaluation has been conducted. This is a critical path activity and is needed to avoid extending the DAEC refueling outage. The Operational Evaluation is scheduled to begin on August 13, 1990. We have taken the measures outlined below which will compensate for the weaknesses identified in the requalification examinations and will assure that all requirements are met during reload operations and cold shutdown.

During reload operations we will not use operating crews that failed the requal exam. We will use crews that have either passed the requal exam or have received enhanced training. An individual who holds a Senior Reactor Operator (SRO) license and who passed the requalification examination will be assigned to oversee the operating crews which did not participate in the requalification exam. Thus, the crews during reload operations will meet the requirements of Section E of the CAL. Five experienced Senior Reactor Operators who did not participate in the NRC administered exam and have not received enhanced training will be restricted to directly supervising fuel handling.

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The five SROs used to supervise fuel handling have previous fuel reloading experience and extensive operating experience. In addition one individual was a reactor engineer, and 3 individuals have had experience as reactor operators. Due to the level of experience and background of these individuals we have a high degree of confidence in their ability to supervise fuel handling.

All of the members of the control room crews to be used during reloading except for those who passed the exam, are now participating in enhanced requalification training. This training includes simulator and classroom time. Before the scheduled date for beginning reload operations (August 8) each control room crew member who did not participate in the exam will have completed at least 46 hours of enhanced training.

We have conducted an investigation of the recent failures in the requalification examinations and have done a root cause analysis. The report of the investigation is now being prepared but many of the potential improvements which it identified have already been incorporated into the training program. These include:

1. Time on simulator: The crews tested in the recent requalification examination had only 33 hours of hands-on practice on the site-specific simulator. The enhanced training given since those examinations includes an additional 33 hours of hands-on simulator training and 13 hours of instruction and classroom training. Some crews had been reorganized in late April and, therefore, had very little time together prior to the exam. The enhanced training since the examination will provide reorganized crews with additional time to develop improved teamwork and communications.
2. Standards Strictly Enforced: During earlier requalification training, the grading of performance of critical tasks was less rigorous than during the annual exam. This discrepancy has been corrected in the training now being conducted and standards are clearly communicated and strictly enforced. The scenarios being used in the current training are of the same level of difficulty as those used for the annual examination.
3. Cooperation between Operations Department and Training Department: Prior to the examination, conflicts had arisen between the two departments which remained unresolved. One example was the interpretation of "before" statements. These conflicts have now been resolved.
4. Motivation: DAEC operators had historically performed very well during their annual exams. Therefore, operators and managers involved in the program were over confident in our ability to pass the annual exam. We are now aware that we have demonstrated performance weaknesses, and are highly motivated to correct those deficiencies. In fact, many operators have volunteered their own time to assist in the enhanced training of other crews.

5. Increased Operations Involvement in Training: Prior to the recent exams, there was little effective involvement by the Operations Department in this training program. During the current enhanced training, the Operations Supervisor or his representative has been intimately involved.

The improvements listed above were identified during the investigation and analysis of the recent failures as necessary to achieve an effective remedial and enhanced training program. Implementation of these improvements gives us confidence that our operators will be adequately trained on the EOPs and will perform satisfactorily during the Operational Evaluation.

The root cause analysis report will identify other items which can be implemented on a long term basis to ensure that our program is satisfactorily maintained. However, these long term corrective actions are not necessary to support this Operational Evaluation.

The DAEC now has enough licensed operators who passed the recent requalification examination to meet the minimum requirements of the Technical Specifications during cold shutdown.

In summary, seventeen (17) licensed operators at the DAEC have received at least 46 hours of enhanced training since the recent requalification examinations were conducted. This training incorporated improvements designed to correct the weaknesses identified during the examinations and in the subsequent investigation. We are confident that the crews which have received the enhanced training will perform satisfactorily. We request that CAL RIII-90-013 be modified to permit core reload before completion of the Operational Evaluation scheduled to begin August 13, 1990.

Very truly yours,



Daniel L. Mineck
Manager, Nuclear Division

DLM/VJC/pl

cc: Director of Nuclear Reactor Regulation
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NRC Resident Inspector - DAEC

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