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P. O. BOX 800

2244 WALNUT GROVE AVENUE

ROSEMEAD, CALIFORNIA 91770

DAVID J. FOGARTY
EXECUTIVE VICE PRESIDENT

REGION V TELEPHONE
213-572-2796

July 13, 1984

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

IE HQ FILE COPY

Attention: Mr. J. B. Martin, Regional Administrator

Dear Sir:

Subject: Docket Nos. 50-361 and 50-362
Operator Requalification Program
San Onofre Nuclear Generating Station, Units 2 and 3

Your letter of June 26, 1984, provided the results of Mr. L. F. Miller's evaluation of our Licensed Operator requalification training program and requested notification of our commitment to incorporate certain measures into that program. Specifically, we were requested to:

1. Temporarily relieve from licensed duties for accelerated retraining and re-examination, any licensed operator who receives an individual section grade less than 70%, or an overall grade of less than 80%, in the written examination portion of the requalification program, and
2. Implement improved methods for ensuring that classroom lectures intended as refresher training in the requalification program, are either attended by operators as scheduled or made up in a prescribed manner.

In regard to Item 1, our Operator Requalification Program, initiated in 1982, contains provisions for the temporary removal from licensed duties and accelerated retraining and re-examination of any operator who fails to meet the specific section or overall minimum score as stated in (1) above on the basis of SCE grading. As stated in the exit meeting with Mr. Miller on June 1, 1984, operators who failed to meet the specific section or overall minimum score on the basis of SCE grading had already been relieved of licensed responsibilities and had entered the intensive retraining program. The NRC grading of the combined NRC/SCE exam given on April 23, 1984, did not result in identification of any additional operators requiring retraining and re-examination beyond those already identified by SCE grading to be in need of such retraining. For future combined written examinations, any operator who fails to meet the specific section or overall minimum score, based on either SCE or NRC grading will be temporarily relieved from licensed duties for accelerated retraining and re-examination.

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In regard to Item 2, our Operator Requalification Program contains provisions for classroom lectures including the use of films, video tapes and other training aids containing the material covered in any missed lectures. While not explicitly discussed in our program, self-study packages are utilized as other training aids. However, based on the results of your evaluation, we concur that our program can be strengthened by requiring that missed lectures be made up by attendance at a later scheduled lecture, by viewing of a video taped lecture or by completing a comparable computer-aided instruction followed by satisfactory completion of a written and/or oral exam on the subject matter rather than solely by the use of self-study packages.

For your information, based on the receipt of Mr. D. G. Eisenhut's Generic Letter 84-14 dated May 11, 1984, and the results of your evaluation discussed above, we have undertaken an in-depth review of all aspects of our Operator Requalification Program. The initial results of our review of the current program indicates that our program could be strengthened in several areas. Although Generic Letter 84-14 requests that a description of our requalification training program be submitted with our next annual FSAR update, scheduled for February 1985, it is our intention to submit an upgraded Operator Requalification Training Program prior to November 1, 1984. As part of the development of this upgraded program, we intend to consider the relative length and difficulty of RO and SRO written examinations prepared by us, as well as the severity of our grading of such examinations consistent with the discussion in your evaluation.

If there are any questions regarding the above or you wish to discuss this matter further, please contact me.

Sincerely,

*Paul B. Ray for
David J. Fogarty*