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SUBJECT: Responds to 811211 ltr re senior operator exams & training.  
 Remedial training program encl. Changes will be documented  
 in subsequent FSAR amend.

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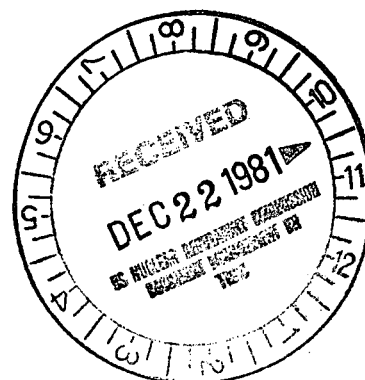
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Director, Office of Nuclear Reactor Regulation  
Attention: Mr. Frank Miraglia, Branch Chief  
Licensing Branch No. 3  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555



Gentlemen:

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

The purpose of this letter is to respond to the NRC's December 11, 1981 letter concerning senior reactor operator (SRO) examinations and training. Southern California Edison Company (SCE) has conducted an evaluation of the SRO training program administered to the San Onofre Nuclear Generating Station, Unit 2 (SONGS 2) SRO candidates in October, 1981 to determine and remedy the cause of the high failure rate on the Cold License SRO Examination. Following this review and evaluation of the cold license training program, a remedial training program was developed to prepare selected candidates for reexamination.

The Remedial Training Program was presented and discussed at meetings with Nuclear Regulatory Commission (NRC) Management on December 3 and 4, 1981 in Bethesda, Maryland. At those meetings, the NRC accepted SCE's Remedial Training Program and requested that the program be submitted in a future amendment to the SONGS 2&3 Final Safety Analysis Report (FSAR). Sixty-three copies of the requested change to FSAR Section 13.2, Training, are provided as an enclosure to this letter. The change will be incorporated in the next formal amendment to the FSAR. The Remedial Training Program was implemented on November 16, 1981 and will be complete January 15, 1981.

The NRC's letter of December 11, 1981 also addresses the waiver of simulator examinations for SONGS 2 cold license applicants. SCE addressed this subject in a letter dated December 11, 1981 from Mr. K. P. Baskin to Mr. P. F. Collins.

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Mr. Frank Miraglia

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SCE is continuing to re-examine the training program and will make permanent modifications to the program. The resulting training program changes will be documented in a subsequent FSAR amendment.

If you have any questions regarding this matter, please contact me.

Very truly yours,

*VP Bostini*

Enclosure

#### 13.2.1.1.11 Remedial Training Program

Southern California Edison Company (SCE) has conducted an evaluation of the SRO training program administered to the San Onofre Nuclear Generating Station, Unit 2 (SONGS 2) Senior Reactor Operator (SRO) candidates in order to identify and remedy the cause of the high failure rate on the October, 1981 Cold License SRO examination.

As a result of the evaluation, it was concluded that the SRO candidates were deficient in knowledge of Technical Specifications and Plant Procedures and that the training program inadequately prepared them for a written SRO examination in these areas. Due to changes in plant design, the Technical Specifications and many procedures for which the examinees were accountable were under revision on an ongoing basis. Consequently, the unavailability of these documents in stable form resulted in minimal coverage in the formal training program and uncertainties in private study.

Several other factors may have contributed to the exam failures: (1) The final 7 week period prior to the exam included a 3 week period of shift work which detracted from the time available for examination preparation; (2) a practice written examination administered as part of the training program was not SRO exam level format and may have contributed to a lower capability to respond in SRO (ie, essay, depth) style; (3) turnover of several key management personnel in the SONGS training organization possibly resulted in deficiencies in continuity of program monitoring.

Following this review and evaluation of the cold license training program and examination results, a remedial training program was developed to prepare selected candidates for reexamination; several successful October RO candidates are also included in this training program. An outline of the remedial program is shown in Table 13.2-2. The program is heavily weighted in the administrative areas identified as being significantly deficient, and also includes a review of all other SRO exam topics. Additionally candidates will be relieved of all other duties during the program, and special arrangements will be made for study and individual assistance, as necessary. The quality of instruction will be the best available from both SCE and contractor personnel. Representatives of SCE's independent contractor will be on site throughout the program to monitor program content and quality of instruction, and additional SRO practice exams, including an audit exam by an independent organization, will be administered.

Table 13.2-2

IA. SIXTY-FIVE PERCENT (65%) OF THIS PROGRAM WILL EMPHASIZE THE FOLLOWING AREAS

<u>Title of Segment</u>	<u>Approximate No. of Days</u>
1. Technical Specification	5
2. Operating/Administrative/Emergency Procedures	7
3. Oral Walk Throughs	2
4. October SRO Exam Review	1.5
5. Practice SRO Written Exam and Review	4
6. Radwaste Systems, ARMS, ORMS	2
7. Radwaste Procedures	7
8. CPC's COLSS, CEAC's	6

IB. A GENERAL REVIEW WILL BE PROVIDED IN REMAINING AREAS

<u>Title of Segment</u>
1. Reactor Theory
2. Emergency Preparedness
3. 10 CFR 20 - Health Physics, ALARA
4. Heat Transfer and Thermodynamics
5. Fuel Handling and Core Parameters
6. Natural Circulation
7. Transient Analysis

ADDITIONAL PROGRAM FEATURES

1. Candidates will be dedicated to training only; no shift work or instructor duties will be assigned
2. Individual assistance needs will be determined and provided
3. All lectures will be video-taped to facilitate student review
4. The quality of instruction will be the most highly qualified in the industry
5. A classroom, plus library, plus motel rooms will be available for study
6. Intensive program began 11/16/81, and will be completed 1/15/82

II. THE DECEMBER AUDIT EXAM WILL BE SRO LEVEL EXAM.

October SRO Exam Review and December SRO Practice Exam administered by consultants not associated with overall program.

III. SELECTION OF CANDIDATES TO BE EXAMINED FOR AN SRO LICENSE IN JANUARY, 1982 WAS BASED ON THE FOLLOWING CONSIDERATIONS.

1. Relative standing in the October RO and SRO written examination results,
2. Length and type of commercial power plant and/or Navy experience,
3. Station Management assessment of ability to perform in a supervisory capacity, and
4. Evaluation of the results of inhouse and independently administered audit examinations.