

March 4, 1997

Carolina Power and Light Company
ATTN: Mr. M. E. Herrell
Manager - Training
H. B. Robinson Steam Electric Plant
Robinson Nuclear Project Department
3581 West Entrance Rd.
Hartsville, SC 29550

SUBJECT: RESPONSE TO QUESTIONS RAISED DURING THE REGION II 1996 U. S.
NUCLEAR REGULATORY COMMISSION (NRC) TRAINING MANAGERS' CONFERENCE

Dear Mr. Herrell:

This is forwarding the response to the four questions raised during our conference. After consultation with headquarters, these responses were determined.

- a) What is the basis for requalification hours having to be the same for active versus inactive operators?

10 CFR Part 55.55(e) recognizes the difference between licensed operators who are actively performing the function of an operator and those who are not, and defines required periods of watchstanding under instruction that must be completed in order to regain active status if proficiency is not maintained. However Part 55.59, "Requalification," does not differentiate between active operators and inactive operators. Each licensed operator is required by Part 55.59 to successfully complete a requalification program developed by the facility licensee in accordance with a systems approach to training. Logically the job tasks, and therefore the training requirements for a licensed operator do not depend on an inactive or active watchstanding status. NRC's position on this issue was clearly stated in NUREG-1262, "Answers to Questions at Public Meeting Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses." The answer to question 335 states that the same requalification program applies to operators on shift as well as off shift.

- b) Can an operator on-site be allowed to not be in requalification training if he is in a developmental assignment, as an operator off-site in a developmental assignment is allowed?

No. NRR's position is that individuals who are licensed will participated in a facility's continuous requalification program, as required by Part 55.53(h). Exceptions to this requirement are considered in accordance with Part 55.59(b), for personnel who relocated out of the vicinity of the facility for developmental purposes, such as a rotation at INPO, or for personnel who take a leave of absence to advance their education.

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- c) Can the requirement be changed to allow reactivity manipulations for initial candidates to be accomplished on the simulator?

The present requirement reflects the Commission's view at the time of the rule revision that candidates for operator licenses should have as a minimum the practical experience of performing reactivity manipulations on the plant for which they seek a license. While it may be possible to change the rule, depending on the views of the present Commission and of the staff, the requirement is not presently considered overly burdensome to the point that rulemaking at this time is warranted. For facilities in extended shutdowns, NRC has allowed candidates to take licensing examinations and then has held issuance of their licenses pending completion of the requirement. Under appropriate circumstance, NRR can exempt candidates from the requirement.

- d) Was the recent GFES examination time validated and should it be ?

The October 1996 GFES examination was time validated. The examination is not intended to be time limiting, within reason. Based on industry feedback, we have increased the allowed time for the GEFS examination from 2.5 hours to 3 hours.

I trust these answers will be of assistance to you.

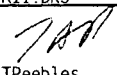
Also, please note we have a need to move the Training Manager's Conference to November 12 and 13, 1997.

Sincerely,

(Original signed by T. A. Peebles)

Thomas A. Peebles, Chief
 Operator Licensing and Human
 Performance Branch
 Division of Reactor Safety

Docket No.: 50-261

OFFICE	RIL:DRS					
SIGNATURE						
NAME	TPeebles					
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COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO