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RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director
STOLZ,J.F. Operating Reactors Branch 4

SUBJECT: Forwards response to NRC 821015 request for addl info re licensee compliance w/NUREG-0737,Items I.A.2.1.4 & II.B.4 concerning personnel training.Description of Phase II core damage mitigation training encl.

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November 19, 1982

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. John F. Stolz, Chief
Operating Reactors Branch No. 4

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

Dear Sir:

Please find attached our response to your letter of October 15, 1982 which requested additional information regarding personnel training at Oconee Nuclear Station. This information relates to NUREG-0737, Items I.A.2.1.4 and II.B.4. Please note that since receiving your letter, Mr. Pierce Skinner of the NRC, Region II, has visited Oconee Nuclear Station and discussed Item 3 of your request with our Training Center personnel. Mr. Skinner stated that he had originated Item 3, but after lengthy discussions with Oconee Training Center personnel, he has decided that he does not now need the specific information requested in Item 3. The information he now desires is provided in Attachment 6.

Very truly yours,

H.B. Tucker /JFN

Hal B. Tucker

JFN/php
Attachment

A046

Oconee Nuclear Station
Request for Additional Information

Item 1

Item II.B.4 of NUREG-0737 requires that training for mitigating core damage be provided to the shift technical advisors (STAs) and operating personnel from the plant manager through the operations chain to the licensed operators in accordance with Enclosure 3 of Denton's March 28, 1980 letter. A review of the documents indicates that there are no requirements for the station manager and assistant station manager to receive this training. (Note: The assistant station manager has received the training although the program does not discuss this requirement for his position.)

Please provide details on the training that is required to be provided to the station manager and the assistant station manager to meet the above requirements of NUREG-0737.

Response

Core Damage Mitigation Training at Oconee Nuclear Station consists of two phases. Attachment 1 shows the outline of Phase I training. This training has been presented to the Station Manager, Technical Services and Maintenance Managers as well as top level Technicians in Maintenance and Technical Services. This training will be offered on an on-going basis to ensure that individuals who reach these classifications will receive this training.

The Station Manager's Training is commensurate with his responsibilities, experience and training. The Station Manager does not hold an SRO License and therefore, the training normally given to the Operations Licensed individual is not necessary. Training that is necessary consists of Phase I Training as well as information on modifications that mitigate Core Damage. Please note that the Assistant Station Manager position at Oconee no longer exists.

Item 2

Item II.B.4 of NUREG-0737 requires managers and technicians in the Instrumentation and Control (I&C), health physics, and chemistry departments receive training for mitigating core damage commensurate with their responsibility.

Please describe in detail the program to provide training/retraining in this subject for the personnel identified above.

Response

Attachments 2 through 5 describe the Phase II Core Damage Mitigation Training given to personnel in health physics, chemistry, instrument and electrical, and performance sections.

Item 3

Enclosure 4 to Denton's March 28, 1980 letter requires that reactivity control manipulations identified in the enclosure be performed on a two-year cycle. This enclosure identifies six operations that must be performed annually with the remainder being performed on a two year basis. This is a total of approximately 40 manipulations over the two year period. Oconee Nuclear Station Requalification Program for NRC licensed personnel, revised July 14, 1980, in section 4.2 requires only ten such evoluations. In your letter to NRR dated May 25, 1982, you stated that usage of the B&W simulator in Lynchburg, Virginia, precludes performing all of the stated reactivity changes in Enclosure 4 to Denton's letter because of scheduling difficulties and lack of direct applicability to training effectiveness because of simulator-to-plant differences.

Please identify each of the simulated reactivity changes that will not be accomplished during the training cycle and the basis for this determination, identify if the evolution could be performed during plant evolutions, and if these evolutions are not performed please provide a listing of the simulated evolutions that are required to be performed at the simulator on a recurring basis.

Response

As indicated in the cover letter, Mr. Pierce Skinner of the NRC, Region II, requested that we modify our response to provide information he needs instead of specifically responding to Item 3. Attachment 6 provides the information requested by Mr. Skinner.

ATTACHMENT I

PROGRAM: Advanced Training

MODULE: N/A

TOPIC: N/A

LESSON: Core Damage Mitigaton Training

TIME
Lecture: 8 Hrs

OVERVIEW:

The incident that occurred at Three Mile Island has had a significant effect upon the Nuclear Power Industry. All station personnel should be aware of the sequence of events that could lead to inadequate core cooling, their responsibilities in preventing such a mishap and how to respond and minimize core damage should a similar situation occur.

OBJECTIVES:

Upon completion of this lesson, the trainee will be able to:

1. Identify the significant events that lead to the Three Mile Island incident.
2. Describe or define the following terms resulting from Three Mile Island.
   - A. TMI
   - B. ICC
   - C. PAM
   - D. ATWS
   - E. PORV
   - F. HF
   - G. Mitigate
   - H. CDMT
   - I. Small Break LOCA
   - J. INPO
3. Describe sources of misinformation that eventually resulted in inadequate core cooling.
4. Explain the importance of good Health Physics practices under all circumstances.
5. Describe precautions being initiated by Duke Power Company to mitigate core damage.

OUTLINE:

1.0 INTRODUCTION

2.0 PRESENTATION

2.1 General Overview of The Sequence of Events That Occurred at Three Mile Island

2.2 List of Abbreviations or Terms Associated with or Resulting from TMI

2.3 Techniques for Protection Against Core Damage

2.3.1 Small break LOCA

2.3.2 Adequate core cooling

2.4 Recognition of Core Damage

2.4.1 Inadequate core cooling

2.4.2 Core damage that could result from ICC

2.4.3 Use of Incore detectors in recognizing core damage

2.4.4 Use of Incore thermocouples

2.4.5 Use of Excore source range monitors

2.4.6 Primary Chemistry

2.5 Mitigation of Core Damage and its Consequence

2.5.1 Duke Power Company's Crisis Management Team

2.5.2 Plant modification resulting from TMI

2.5.3 Radiation hazards and response of radiation monitors

2.5.4 General attitude and awareness required by all personnel in case of core damage

ATTACHMENT 2

OCONEE NUCLEAR STATION

HEALTH PHYSICS

CORE DAMAGE MITIGATION TRAINING PHASE II

* A) Health Physics Organization
   1) Notification and Communication
   2) Organizational Chart and Alternates
   3) Responsibilities
   4) Training for Emergency Response

	NON-EXEMPT	EXEMPT
Who does training?	Health Physics (#1 - Emergency Coordinator)	Health Physics (#1 - Emergency Coordinator)
Who receives training?	All Health Physics Non-Exempt Personnel	All Health Physics Exempt Personnel
How is training done?	EQP, Drills	Training Lectures, Drills
Frequency	Yearly, Semi-Annually	Yearly, Semi-Annually
Length of training	Approximately one hour, varies (1 hr. - 8 hrs.)	Approximately one hour, varies (1 hr. - 8 hrs.)
Documentation	EQP, TSR-10	TSR-10, TSR-10

*Management should receive - A1, A2, A3

B) Environmental Monitoring

1) Personnel
2) Locations
3) Communication
4) Equipment
5) Training for Field Monitoring Teams

	NON-EXEMPT	EXEMPT
Who does training?	#1 - 4 Health Physics #5 Field Monitoring Coordinator	#1 - 4 Health Physics (Field Monitoring Coordinator
Who receives training?	#1 - 4 All Health Physics Non-Exempt personnel. #5 Environmental Monitoring Team Members from HP	#1 - 4 All Health Physics Exempt Personnel
How is training done?	#1 - 4 EQP, Drills	#1 - 4 Lectures, Drills
Frequency	#1 - 4 Yearly, Semi-Annually	#1 - 4 Yearly, Semi-Annually
Length of training	#1 - 4 Approximately 1 hour, varies (1 hr. - 8 hrs.)	#1 - 4 Approximately 1 hour, varies (1 hr. - 8 hrs.)
Documentation	#1 - 4 EQP, TSR-10	#1 - 4 TSR-10, TSR-10

C) Respiratory and Instruments

1) Operation of Respiratory and Instrument during Emergency

2) Locations

3) Supplies

a) On-Site

b) Off-Site

	NON-EXEMPT	EXEMPT
Who does training?	Health Physics	Health Physics
Who receives training?	All Health Physics Non-Exempt Personnel	All Health Physics Exempt Personnel
How is training done?	EQP, Drills	Lectures, Drills
Frequency	Yearly, Semi-Annually	Yearly, Semi-Annually
Length of training	Approximately 1 hour, varies (1 hr. - 8 hrs.)	Approximately 1 hour, varies (1 hr. - 8 hrs.)
Documentation	EQP, TSR-10	TSR-10, RSR-10

* D) Data Evaluation

1) Personnel
2) Location
3) Off-Site Dose
   a) Meteorology
   b) Protective Action Guides
4) In-Plant Data Evaluation
5) Training for Calculations

	NON-EXEMPT	EXEMPT
Who does training?	#1 - 4 Health Physics	#1 - 4 Health Physics #5 HP Projects and Training
Who receives training?	#1 - 4 All Health Physics Non-Exempt Personnel	#1 - 4 All Health Physics Exempt Personnel #5 HP Projects and Training
How is training done?	#1 - 4 EQP, Drills	#1 - 4 Lectures, Drills #5 Lectures, Drills, Practice Session
Frequency	#1 - 4 Yearly, Semi-Annually	#1 - 4 Yearly, Semi-Annually #5 As needed, Semi-Annually Quarterly
Length of training	#1 - 4 Approximately 1 hour varies (1 hr. - 8 hrs.)	#1 - 4 Approximately 1 hour varies (1 hr. - 8 hrs.) #5 Approximately 2 hrs. varies (1 hr. - 8 hrs.) Approx. 2-4hrs
Documentation	#1 - 4 EQP, TSR-10	#1 - 4 TSR-10, TSR-10 #5 TSR-10, TSR-10, TSR-10

* Management should receive D3, D4

* E) Operational Support Center

1) Personnel
2) Operation of OSC
3) Health Physics Duties
4) Site Evacuation
5) Decontamination
6) Access Controls

	NON-EXEMPT	EXEMPT
Who does training?	Health Physics, (#1, 2 Emergency Coordinator) (Medical Rescue Team-Safety)	Health Physics (#1, 2 Emergency Coordinator)
Who receives training?	All Health Physics Non-Exempt Personnel	All Health Physics Exempt Personnel
How is training done?	EQP, Drills	Lectures, Drills
Frequency	Yearly, Semi-Annually	Yearly, Semi-Annually
Length of training	Approximately 1 hour, varies (1 hr. - 8 hrs.)	Approximately 1 hour, varies (1 hr. - 8 hrs.)
Documentation	EQP, TSR-10	TSR-10, TSR-10

* Management should receive E2, E3, E4, E5, E6

* F) Exposure Control

1) Personnel
2) Records
3) Limits
4) Location
5) Dosimetry Supplies
   a) On-Site
   b) Off-Site
6) Potassium Iodide (KI)

	NON-EXEMPT	EXEMPT
Who does training?	Health Physics	Health Physics
Who receives training?	All Health Physics Non-Exempt Personnel	All Health Physics Exempt Personnel
How is training done?	EQP, Drills	Lectures, Drills
Frequency	Yearly, Semi-Annually	Yearly, Semi-Annually
Length of training	Approximately 1 hour, varies (1 hr. - 8 hrs.)	Approximately 1 hour, varies (1 hr. - 8 hrs.)
Documentation	EQP, TSR-10	TSR-10, TSR-10

* Management should receive F2, F3, F4, F6

G) Sampling and Analysis

1) Operation of Count Room and Body Burden Analysis
2) Personnel
3) Location
4) Sampling and Frequency of Sampling
5) Tech. Spec.

	NON-EXEMPT	EXEMPT
Who does training?	Health Physics	Health Physics
Who receives training?	All Health Physics Non-Exempt Personnel	All Health Physics Exempt Personnel
How is training done?	EQP, Drills	Lectures, Drills
Frequency	Yearly, Semi-Annually	Yearly, Semi-Annually
Length of training	Approximately 1 hr. varies (1 hr. - 8 hrs.)	Approximately 1 hr. varies (1 hr. - 8 hrs.)
Documentation	EQP, TSR-10	TSR-10, TSR-10

H) Post Accident Sampling Panels

1) Operation
2) Location
3) Requirements for use
4) Sample transport
5) Training for use of panels

	NON-EXEMPT	EXEMPT
Who does training?	Health Physics (Chemistry - Liquid Panels)	Health Physics (Chemistry - Liquid Panels)
Who receives training?	All Health Physics Non-Exempt Personnel	#1 - 4 Yearly, Semi-Annually
How is training done?	EQP, Drills	#1 - 4 Lectures, Drills
Frequency	Every 6 Months, Semi-Annually	#1 - 4 Yearly, Semi-Annually
Length of training	#1 - 4 Approximately 1 hr., varies (1 hr. - 8 hrs.) #5 Approximately 4 hrs.	#1 - 4 Approximately 1 hr. varies (1 hr. - 8 hrs.)
Documentation	EQP, TSR-10	#1 - 4 TSR-10, TSR-10

1) Emergency Equipment
   1) Locations and Keys
   2) Type and uses for supplies
   3) Inventory
   4) Supplies available from outside ONS

	NON-EXEMPT	EXEMPT
Who does training?	Health Physics	Health Physics
Who receives training?	All Health Physics Non-Exempt Personnel	All Health Physics Exempt Exempt Personnel
How is training done?	EQP, Drills	Lectures, Drills
Frequency	Yearly, Semi-Annually	Yearly, Semi-Annually
Length of training	Approximately 1 hr., varies (1 hr. - 8 hrs.)	Approximately 1 hr., varies (1 hr. - 8 hrs.)
Documentation	EQP, TSR-10	TSR-10, TSR-10

J) Miscellaneous

1) Overview of each Section's Emergency Response Organization
2) Technical Support Center
   a) Operation of TSC
   b) Performance
   c) Management
   d) Chemistry

	NON-EXEMPT	EXEMPT
Who does training?	#1 - Each Section #2a - Emergency Coordinator	#1 Each Section #2a Emergency Coordinator 2b Performance 2c Management 2d Chemistry
Who receives training?	#1, 2a All Health Physics Non-Exempt Personnel	All Health Physics Exempt Personnel
How is training done?	#1, 2a Lectures, Drills	Lectures, Drills
Frequency	#1, 2a Yearly, Semi-Annually	Yearly, Semi-Annually
Length of training	#1, 2a Approximately 1 hr., varies (1 hr. - 8 hrs.)	Approximately 2 hrs, varies (1 hr. - 8 hrs.)
Documentation	TSR-10, TSR-10	TSR-10, TSR-10

ATTACHMENT 3

CORE DAMAGE MITIGATION PHASE II
OCONEE NUCLEAR STATION
CHEMISTRY SECTION TRAINING PLAN

I. Emergency Plan Training

A. General

1. All Chemistry personnel (44)
2. One (1) hour annually
3. Coleman Jennings (or alternate)
4. Document on TSR-10

B. Chemistry Specific Emergency Response

1. All Chemistry personnel (44)
2. One (1) hour annually
3. Chemistry Staff
4. Document on TSR-10

II. Post-Accident Liquid Sampling System

A. General

1. Station Chemist, Power Chemistry and Radwaste Coordinators, all Chemistry staff, Primary, Secondary, Relief, and Radwaste Supervisors (14)
2. 2-4 hours annually
3. Chemistry Staff
4. Document on TSR-10

B. Operation (to include test with minimum score)

1. Two Chemistry staff personnel, Primary and Secondary Supervisors and all Power Chemistry technicians (17)
2. 4-8 hours annually (including lecture and operating experience)
3. Chemistry Staff
4. Document on TSR-10 and EQP

III. Post-Accident Chemistry Assessment

A. General: Methods and Problems/Sampling and Analysis

1. All Power Chemistry technicians (13)
2. 4-8 hours
3. Chemistry Staff
4. Document on TSR-10

B. Specific: Methods and Problems/Sampling and Analysis; Management/Assessment of Data

1. Station Chemist, Power Chemistry and Radwaste Coordinators, all Chemistry Staff, Primary Secondary, and Relief Supervisors (13)
2. 8-16 hours
3. Chemistry Staff to coordinate training materials from Duke Power and B&W.
4. Document on TSR-10

ATTACHMENT 4

DUKE POWER COMPANY
OCONEE NUCLEAR STATION

CORE DAMAGE MITIGATION PHASE II

INSTRUMENT AND ELECTRICAL

In addition to Emergency Plan Training, training on new equipment and other training to insure qualified individuals in the Instrument and Electrical Section, the managers and technicians in the "Specialist" Class will receive training on modifications resulting from TMI and other modifications which mitigate core damage.

Performance Section Core Damage Mitigation Training - Phase II

Attachment 5

TOPIC	WHO RECEIVES	WHO PROVIDES	HOURS	FREQUENCY	DOCUMENTATION
Core Cooling Mechanics	Performance Duty Engineers	Tom Curtis Emergency Plan	2	Once	*TSR 10, Perf. Sect. Emerg. Plan
Primary Gas/Steam Binding	Performance Duty Engineers	Tom Curtis Emergency Plan	1	Once	*TSR 10, Perf. Sect. Emerg. Plan
Recognizing Core Damage	Performance Duty Engineers	Tom Curtis Emergency Plan	2	Once	*TSR 10, Perf. Sect. Emerg. Plan
Monitoring Parameters During Accidents	Performance Duty Engineers	Tom Curtis Emergency Plan	2	Once	*TSR 10, Perf. Sect. Emerg. Plan
Criteria For Cooling Mode Selection	Performance Duty Engineers	Tom Curtis Emergency Plan	1	Once	*TSR 10, Perf. Sect. Emerg. Plan
Emergency Data Transmittal	Performance Specialists	G. O. Offline Unit	2	Once	**TSR 10, from Training Class
Hydrogen Hazzards	Performance Duty Engineers	Unknown	1	Once	**TSR 10, from Training Class
Radiation Hazzards	All Performance Personnel	Unknown	1	Once	**TSR 10, from Training Class

* - Complete
** - To Be Completed 11/11/82

Likely needs of managers:

- Recognizing core damage; out core and in core neutron detector responses to core damage.

Attachment 6

(Item 3 Response per Mr. Pierce Skinner's Request)

Enclosure 4 of Denton's March 28, 1980 Letter stated "the following manipulations and plant evolutions where applicable are acceptable for meeting the reactivity control manipulations required by Appendix A, Paragraph 3a of 10 CFR 55". Paragraph 3a states "for reactor operators and senior operators these manipulations shall consist of at least ten (10) reactivity control manipulations in any combination of..." It was our assumption that the statement in enclosure 4 was to imply that the reactivity changes as listed in enclosure 4 would be those from which the ten (10) required by 10 CFR 55 could be chosen.

In light of the fact that we were procuring a Site Specific Simulator fully a year before our Requalification Program Revision submittal, we worded our revision to indicate that we would continue to meet the requirements of 10 CFR 55, Appendix A, Paragraph 3a by selecting a minimum of ten (10) reactivity changes from the list in enclosure 4 of Harold Denton's March 28th letter. It was our intent that most licensed operators would have significantly more than the minimum required. It was also our intent that upon the arrival and operability for training of our Site Specific Simulator, that we would fully implement enclosure 4 under the more stringent requirements of annual simulator training of all annually required evolutions and some of the bi-annually required evolutions by providing our operators with annual simulator training of a minimum of twenty (20) hours per year.

To better understand the difficulty in applying training lessons learned on the B&W Simulator with actual plant operations at the Oconee Facility, it is important to point-out that the B&W Lynchburg Simulator is similar to the Rancho-Seco Plant of the Sacramento Municipal Utilities District. It is in no way an accurate replication of the Oconee Nuclear units. While the Primary Reactor Coolant System is relatively accurate in it's replication and much of the NSS Systems are generically applicable, the location, labeling, and operation of a significant portion of the Controlling Systems and Instrumentation are significantly different. The Secondary Systems of the B&W Lynchburg Simulator in no way replicate the Oconee Facility. Because of this wide variance, the B&W Lynchburg Facility is a useful tool for generic training for license replacement candidates, and is a fair tool for conceptual and generic PWR response to casualties for Requalification Training. However, its' largest benefit is in the practice derived in operating the Integrated Control Systems for casualty response and visualizing generic PWR Primary System and Reactor Response to casualties.

Because we have approximately one-hundred (100) licensed operators at the Oconee Nuclear Station, it is difficult to schedule even 20 hours annually of simulator training when it must be done at the B&W Facility in Lynchburg, VA. Optimum training effectiveness dictates that the maximum number of students trained at any one time, be limited to three to four operators. With approximately one-hundred licensed operators, this necessitates a minimum of 25 separate trips to the Lynchburg Facility for training. Due to the fact that our Annual Requalification Lecture and Testing Program utilizes approximately thirty (30) weeks of the year and additional time must be set aside for Remedial Requalification Training as needed, and minimum shift staffing which has recently increased, requires careful manipulation of manpower to ensure adequate reserves of personnel to operate the Facility, sufficient time does not allow for this type of scheduling when personnel must be sent off-site.

We anticipated at the time of our July 1980 Requalification Program Revision submittal, that our Site Specific Simulator would be available in 1981 for the Requalification Training of all licensed operators at Oconee

Nuclear Station. Due to circumstances which were beyond our control, the simulator was not delivered in 1981 nor has it been delivered to date. Evaluating this delay in the procurement of our Site Specific Simulator has resulted in our taking the following corrective action:

In August of this year, we made contact with Babcock & Wilcox Company of Lynchburg, Virginia to schedule simulator training for all licensed operators at Oconee Nuclear Station. Because of scheduling constraints and operational scheduling of the facility, it is necessary for us to stretch this simulator training from September of 1982 until May of 1983, at which time all licensed operators at the Oconee Nuclear Station who have been licensed prior to 1982 will have participated in Simulator Training for Requalification during those dates. Our plans are to continue utilizing the B&W Facility, to schedule simulator training on an annual basis for all licensed operators at the Oconee Nuclear Station as scheduling permits, until the delivery and operability for training of our Site Specific Simulator. Following this round/phase of simulator training which will be completed in the Spring of 1983, a detailed review of the Reactivity Control Manipulation Records on the simulator will be made to determine and layout as appropriate, the necessary and needed control manipulations for 1983-84 to be performed either on the B&W Facility in Lynchburg, Virginia or on the Duke Power Oconee Nuclear Station Unit 1 Site Specific Simulator, to insure compliance with Enclosure 4 of Harold Denton's Letter.