

**Advanced Passive 1000 (AP1000)
Generic Technical Specification Traveler (GTST)**

Title: Changes to Section 5.3 Unit Staff Qualifications

I. Technical Specifications Task Force (TSTF) Travelers, Approved Since Revision 2 of STS NUREG-1431, and Used to Develop this GTST

TSTF Number and Title:

None

STS NUREGs Affected:

Not Applicable

NRC Approval Date:

Not Applicable

TSTF Classification:

Not Applicable

II. Reference Combined License (RCOL) Standard Departures (Std. Dep.), RCOL COL Items, and RCOL Plant-Specific Technical Specifications (PTS) Changes Used to Develop this GTST

RCOL Std. Dep. Number and Title:

None

RCOL COL Item Number and Title:

VEGP COL Application, Rev. 3 (Ref. 2):

Bracketed site-specific information in GTS Subsection 5.3, Unit Staff Qualifications

COL Item 5.3, regarding the Reviewer's Note

COL Item 5.3.1, regarding Staff Qualifications during cold license operating training

RCOL PTS Change Number and Title:

None

III. Comments on Relations Among TSTFs, RCOL Std. Dep., RCOL COL Items, and RCOL PTS Changes

This section discusses the considered changes that are: (1) applicable to operating reactor designs, but not to the AP1000 design; (2) already incorporated in the GTS; or (3) superseded by another change.

COL Item 5.3 removes the “Reviewer’s Note” information at the beginning of AP1000 GTS 5.3, Rev. 19. There is no suggested replacement text.

COL Item 5.3.1 replaces the bracketed information in AP1000 GTS 5.3.1, Rev. 19 with new text that includes the staff qualifications during cold license operator training prior to commercial operation.

These changes are discussed in more detail in Section VI “Traveler Information.”

IV. Additional Changes Proposed as Part of this GTST (modifications proposed by NRC staff and/or clear editorial changes or deviations identified by preparer of GTST)

Remove the brackets around the “Reviewer’s Note” text at the beginning of GTS 5.3 such that AP1000 STS 5.3, Rev. 0 will be consistent with WOG STS 5.3, Rev.4.

Make the editorial change to GTS 5.3.2 to match WOG STS 5.3.2 by capitalizing the title “Reactor Operator.”

APOG Recommended Changes to Improve Specification 5.3

Revise “ANS/ANSI 3.1” to “ANSI/ANS 3.1” in section 5.3.1.a.

V. Applicability

Affected Generic Technical Specifications and Bases:

Section 5.3, Unit Staff Qualifications

Changes to the Generic Technical Specifications and Bases:

Remove the brackets around the “Reviewer’s Note” at the beginning of GTS 5.3. (WOG STS 5.3, Rev.4)

Replace the bracketed information in AP1000 GTS 5.3.1, Rev. 19 with new text that includes the staff qualifications during cold license operator training prior to commercial operation. (COL Item 5.3.1 - VEGP Units 3 and 4 PTS 5.3.1)

Change the title in 5.3.2 from “reactor operator” to “Reactor Operator.” (WOG STS 5.3, Rev.4)

Change “TS 5.3.1” to “Specification 5.3.1” in GTS 5.3.2. (WOG STS 5.3, Rev.4)

VI. Traveler Information

Description of TSTF changes:

Not applicable

Rationale for TSTF changes:

Not applicable

Description of changes in RCOL Std. Dep., RCOL COL Item(s), and RCOL PTS Changes:

COL Item 5.3 removes the "Reviewer's Note" at the beginning of GTS 5.3, Rev. 19. However, since this "Reviewer's Note" is included without brackets in WOG STS 5.3, Rev. 4, AP1000 STS 5.3 will retain the note, but without brackets.

COL Item 5.3.1 made the following changes to AP1000 GTS 5.3.1, Rev. 19:

- Replace the bracketed reference information in the first sentence, which is

Each member of the unit staff shall meet or exceed the minimum qualifications of [Regulatory Guide 1.8, Revision 2, 1987, or more recent revisions, or ANSI Standards acceptable to the NRC staff].

with updated information, as follows (changed text is underlined):

Each member of the unit staff shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, Revision 3, 2000,

This GTST modifies the first sentence in GTS 5.3.1 by updating the bracketed reference information, as follows in AP1000 STS 5.3.1:

Each member of the unit staff shall meet or exceed the minimum qualifications of [Regulatory Guide 1.8, Revision 3, 2000, or more recent revisions, or ANSI Standards acceptable to the NRC staff].

- Insert the following bracketed text after the first sentence of GTS 5.3.1:

[, with the following exception:

- a. During cold license operator training through the first refueling outage, Regulatory Position C.1.b of Regulatory Guide 1.8, Revision 2, 1987, applies: cold license operator candidates meet the training elements defined in ANSI/ANS 3.1-1993 but are exempt from the experience requirements defined in ANSI/ANS 3.1-1993].

The added text addresses the staff qualifications during cold license operator training prior to commercial operation. This inserted bracketed text will be included in AP1000 STS 5.3.1, Rev. 0.

- Delete the last bracketed sentence in GTS 5.3.1, which states

[The staff not covered by Regulatory Guide 1.8 shall meet or exceed the minimum qualifications of Regulations, Regulatory Guides, or ANSI Standards acceptable to NRC staff.]

Since this sentence is included in WOG STS 5.3.1, Rev. 4, it will be retained in AP1000 STS 5.3.1, Rev. 0.

Considering the above discussion of the changes made by the two COL Items, AP1000 STS 5.3.1, Rev. 0, will state:

Each member of the unit staff shall meet or exceed the minimum qualifications of [Regulatory Guide 1.8, Revision 3, 2000, or more recent revisions, or ANSI Standards acceptable to the NRC staff] [, with the following exception:

- a. During cold license operator training through the first refueling outage, the Regulatory Position C.1.b of Regulatory Guide 1.8, Revision 2, 1987, applies: cold license operator candidates meet the training elements defined in ANSI/ANS 3.1-1993 but are exempt from the experience requirements defined in ANSI/ANS 3.1-1993].

[The staff not covered by Regulatory Guide 1.8 shall meet or exceed the minimum qualifications of Regulations, Regulatory Guides, or ANSI Standards acceptable to NRC staff.]

Rationale for changes in RCOL Std. Dep., RCOL COL Item(s), and RCOL PTS Changes:

VEGP COL application, Rev. 3, justified deleting the reviewer's note to complete COL Item 5.3 by stating, "the reviewer's note information for this specification is deleted because it is not intended to be a part of plant-specific technical specifications."

This GTST will keep the "Reviewer's Note" at the beginning of this Section as stated by AP1000 GTS 5.3, Rev. 19 and WOG STS 5.3, Rev. 4 in order to keep AP1000 STS 5.3 generic and not plant-specific. However, the brackets around the "Reviewer's Note" in GTS 5.3 will be removed by this GTST so that AP1000 STS 5.3, Rev. 0 will be consistent with WOG STS 5.3, Rev. 4 (do not use brackets around reviewer's notes).

COL Item 5.3.1 replaced "Regulatory Guide 1.8, Revision 2, 1987" with "Regulatory Guide 1.8, Revision 3, 2000" to keep the reference up to date.

Even though staff qualification requirements are part of Regulatory Guide 1.8, COL Item 5.3.1 inserted text regarding cold license operators in GTS 5.3.1 because GTS 5.3.1 does not address qualifications for cold license operators. The inserted text is acceptable because the proposed exception is based on an approved staff position.

The inserted text regarding cold license operators is included by this GTST in AP1000 STS 5.3.1, Rev. 0. However, all of the inserted text will be bracketed to allow for cases where the entire unit staff is covered by the standard specified in the first sentence or where certain staff positions need qualification exceptions to be specified.

Description of additional changes proposed by NRC staff/preparer of GTST:

None

Rationale for additional changes proposed by NRC staff/preparer of GTST:

Not applicable

VII. GTST Safety Evaluation

Technical Analysis:

The inserted text added to GTS 5.3.1 addresses the staff qualifications during cold license operator training prior to commercial operation. In AP1000 STS 5.3.1, however, the inserted text will be bracketed in its entirety. In addition, the brackets around the last paragraph in GTS 5.3.1 are retained to allow for plant-specific exceptions to staff position qualification requirements.

Other changes made to GTS 5.3.1 do not affect the technical content but improve the readability, implementation, and understanding of the requirements, and are therefore acceptable.

Having found that this GTST's proposed changes to the GTS are acceptable, the NRC staff concludes that AP1000 STS Section 5.3 is an acceptable model Specification for the AP1000 standard reactor design.

References to Previous NRC Safety Evaluation Reports (SERs):

None

VIII. Review Information

Evaluator Comments:

None

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Review Information:

Availability for public review and comment on Revision 0 of this traveler approved by NRC staff on 5/22/2014.

APOG Comments (Ref. 7) and Resolutions:

(Internal #509) APOG revises “ANS/ANSI 3.1” to “ANSI/ANS 3.1” in Section 5.3.1. This is resolved by making the recommended change.

NRC Final Approval Date: 12/14/2015

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IX. Evaluator Comments for Consideration in Finalizing Technical Specifications and Bases

None

X. References Used in GTST

1. AP1000 DCD, Revision 19, Section 16, "Technical Specifications," June 2011 (ML11171A500).
2. Southern Nuclear Operating Company, Vogtle Electric Generating Plant, Units 3 and 4, Technical Specifications Upgrade License Amendment Request, February 24, 2011 (ML12065A057).
3. NRC Safety Evaluation (SE) for Amendment No. 13 to Combined License (COL) No. NPF-91 for Vogtle Electric Generating Plant (VEGP) Unit 3, and Amendment No. 13 to COL No. NPF-92 for VEGP Unit 4, September 9, 2013, ADAMS Package Accession No. ML13238A337, which contains:

ML13238A355 Cover Letter - Issuance of License Amendment No. 13 for Vogtle Units 3 and 4 (LAR 12-002).

ML13238A359 Enclosure 1 - Amendment No. 13 to COL No. NPF-91

ML13239A256 Enclosure 2 - Amendment No. 13 to COL No. NPF-92

ML13239A284 Enclosure 3 - Revised plant-specific TS pages (Attachment to Amendment No. 13)

ML13239A287 Enclosure 4 - Safety Evaluation (SE), and Attachment 1 - Acronyms

ML13239A288 SE Attachment 2 - Table A - Administrative Changes

ML13239A319 SE Attachment 3 - Table M - More Restrictive Changes

ML13239A333 SE Attachment 4 - Table R - Relocated Specifications

ML13239A331 SE Attachment 5 - Table D - Detail Removed Changes

ML13239A316 SE Attachment 6 - Table L - Less Restrictive Changes

The following documents were subsequently issued to correct an administrative error in Enclosure 3:

- ML13277A616 Letter - Correction To The Attachment (Replacement Pages) - Vogtle Electric Generating Plant Units 3 and 4-Issuance of Amendment Re: Technical Specifications Upgrade (LAR 12-002) (TAC No. RP9402)
- ML13277A637 Enclosure 3 - Revised plant-specific TS pages (Attachment to Amendment No. 13) (corrected)
4. TSTF-GG-05-01, "Writer's Guide for Plant-Specific Improved Technical Specifications," June 2005.
 5. RAI Letter No. 01 Related to License Amendment Request (LAR) 12-002 for the Vogtle Electric Generating Plant Units 3 and 4 Combined Licenses, September 7, 2012 (ML12251A355).
 6. Southern Nuclear Operating Company, Vogtle Electric Generating Plant, Units 3 and 4, Response to Request for Additional Information Letter No. 01 Related to License Amendment Request LAR-12-002, ND-12-2015, October 04, 2012 (ML12286A363 and ML12286A360).

7. APOG-2014-008, APOG (AP1000 Utilities) Comments on AP1000 Standardized Technical Specifications (STS) Generic Technical Specification Travelers (GTSTs), Docket ID NRC-2014-0147, September 22, 2014 (ML14265A493).
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XI. MARKUP of the Applicable GTS Subsection for Preparation of the STS NUREG

The entire section of the Specifications and the Bases associated with this GTST is presented next.

Changes to the Specifications and Bases are denoted as follows: Deleted portions are marked in strikethrough red font, and inserted portions in bold blue font.

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

----- REVIEWER'S NOTE -----

[Minimum qualifications for members of the unit staff shall be specified by use of an overall qualification statement referencing an ANSI Standard acceptable to the NRC staff or by specifying individual position qualifications. Generally, the first method is preferable; however, the second method is adaptable to those unit staffs requiring special qualification statements because of unique organizational structures.]

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of [Regulatory Guide 1.8, Revision ~~23~~, ~~1987~~**2000**, or more recent revisions, or ANSI Standards acceptable to the NRC staff]- **[, with the following exception:**

- a. During cold license operator training through the first refueling outage, Regulatory Position C.1.b of Regulatory Guide 1.8, Revision 2, 1987 applies. Cold license operator candidates meet the training elements defined in ANSI/ANS 3.1-1993 but are exempt from the experience requirements defined in ANSI/ANS 3.1-1993].**

[The staff not covered by Regulatory Guide 1.8 shall meet or exceed the minimum qualifications of Regulations, Regulatory Guides, or ANSI Standards acceptable to NRC staff.]

5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed ~~r~~**R**eactor ~~e~~**O**perator (RO) are those individuals who, in addition to meeting the requirements of ~~T~~**S**pecification 5.3.1, perform the functions described in 10 CFR 50.54(m).

XII. Applicable STS Subsection After Incorporation of this GTST's Modifications

The entire subsection of the Specifications and the Bases associated with this GTST, following incorporation of the modifications, is presented next.

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

----- REVIEWER'S NOTE -----
Minimum qualifications for members of the unit staff shall be specified by use of an overall qualification statement referencing an ANSI Standard acceptable to the NRC staff or by specifying individual position qualifications. Generally, the first method is preferable; however, the second method is adaptable to those unit staffs requiring special qualification statements because of unique organizational structures.

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of [Regulatory Guide 1.8, Revision 3, 2000, or more recent revisions, or ANSI Standards acceptable to the NRC staff] [, with the following exception:

- a. During cold license operator training through the first refueling outage, Regulatory Position C.1.b of Regulatory Guide 1.8, Revision 2, 1987 applies. Cold license operator candidates meet the training elements defined in ANSI/ANS 3.1-1993 but are exempt from the experience requirements defined in ANSI/ANS 3.1-1993].

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