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 AUTH. NAME: TUCKER, H. B. AUTHOR AFFILIATION: Duke Power Co.
 RECIP. NAME: DENTON, H. R. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director
 THOMPSON, H. L. Division of Licensing

SUBJECT: Advises that exemption request re requalification program requested in NRC 850404 ltr unnecessary. Program submitted on 780717 reviewed & approved in NRC 780817 ltr. Only 2.5% of training program taught through self-study.

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 TITLE: Operator Requalification Program

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DUKE POWER COMPANY

P.O. BOX 33189
CHARLOTTE, N.C. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

May 8, 1985

TELEPHONE
(704) 373-4531

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

Attention: Hugh L. Thompson, Jr., Director
Division of Licensing

Subject: Licensed Operator
Requalification Program
Docket Nos. 50-269, -270, -287

Dear Sir:

By letter dated April 4, 1985, the NRC requested that Duke Power Company submit a request for an exemption from lecture requirements as described in 10 CFR Part 55 Appendix A, "Requalification Programs for Licensed Operators of Production and Utilization Facilities". The program was submitted to the NRC by Duke letter dated July 17, 1978 and responded to by NRC letter dated August 17, 1978. This letter, from P. F. Collins, signed by R. J. Bursey, Acting Chief Operator Licensing Branch, Division of Project Management, states:

"This is in reply to your letter of July 17, 1978, in which you submitted a revised Oconee Nuclear Station Requalification Program for NRC Licensed Personnel. Specifically, the Revised Program:

1. Clarifies the definition of Backup Licensee, and
2. Relieves such Backup Licensees from mandatory participation in the Requalification Lectures preceeding the annual exam segments.

Based on our review we have concluded that the revision does not materially decrease the effectiveness of the program. The revised program continues to meet the requirements of Section 50.5411 of 10 CFR Part 50, and Appendix A. of 10 CFR 55."

The purpose for submitting the revision to the Requalification Program was that plant operations frequently precluded backups from being able to attend all of the lecture series preceding the annual examination segments. In addition, the Post-TMI environment made the exemption

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useful when a significant number of backup licensees were being sent to college to obtain a degree. Since that program was terminated, the utilization of the exception in the Requalification Program has been utilized on a very infrequent basis. However, when it is necessary for a backup to miss a segment of the pre-planned lecture series, the individual is provided with all the training materials and the lesson plan used, and the instructor is available for assistance if needed. Frequently, the lecture series have been video taped and are available to the backup for his review.

It should be noted that as a whole only about 2.5% of the training program is taught through self-study per year; therefore, the statement, "The net result appears to be that the entire requalification lecture series for backup operators who pass segment examinations is being replaced by self-study...", is inaccurate.

Considering the information presented above, an exemption request does not seem necessary since it was already reviewed and approved by the commission and the predication for concern is unfounded.

Very truly yours,

H.B. Tucker 1/85
Hal B. Tucker

SGG:slb

cc: Mr. J. C. Bryant
NRC Resident Inspector
Oconee Nuclear Station

Dr. J. Nelson Grace, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Ms. Helen Nicolaras
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555