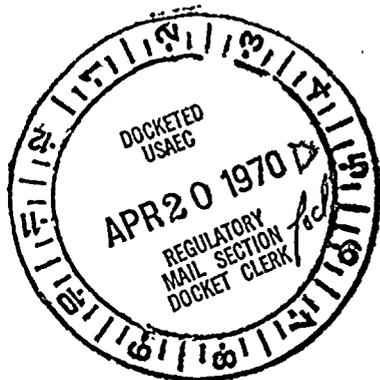


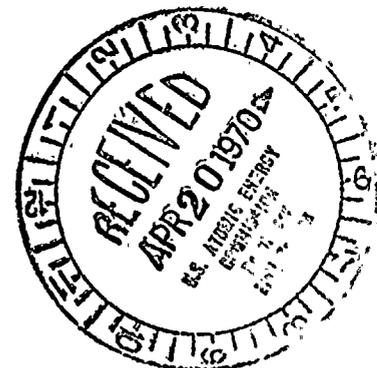
NIAGARA MOHAWK POWER CORPORATION

Regulatory

File Cy

NIAGARA  MOHAWK300 ERIE BOULEVARD WEST
SYRACUSE, N. Y. 13202

April 15, 1970



Dr. Peter A. Morris, Director
Division of Reactor Licensing
United States Atomic Energy Commission
Washington, D. C. 20545

Dear Dr. Morris:

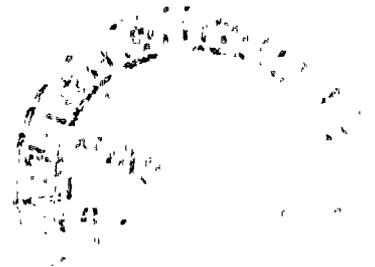
In reference to your letter of February 12, 1970, concerning retraining of licensed operators, I have discussed below our program and the manner in which we intend to discharge it. Inasmuch as our senior operators have been licensed for 9 months and the reactor operators only 3 months, as well as the fact that we have operated for only 30 full power days, the retraining program is, for the most part, what we will carry out in the year ahead. I have outlined our retraining program by answering the questions posed in your letter, in an effort to ensure that all the information that was requested is submitted.

1. A formal retraining program consisting of scheduled lectures has been set up. As planned, the course of instruction will be approximately 50 hours in duration covering the following subjects:
 - a. Principles of Reactor Operation
 - b. Features of Facility Design
 - c. General Operating Characteristics
 - d. Instruments and Controls
 - e. Safety and Emergency Systems
 - f. Standard and Emergency Operating Procedures
 - g. Radiation Control and Safety

Quizzes will be utilized to check on individual retention as well as to uncover group weakness.

2. The retraining program is administered by the Operations Supervisor or a designated assistant. The Reactor Analyst, Radiation Protection Supv., Instrument and Control Supervisor, and other qualified members of the plant staff will conduct the retraining program in their respective fields of interest.
3. Each member of the operating staff is issued a complete set of Plant Operating Procedures, Emergency Procedures, Special Procedures, and the Technical Specifications. When a change is made in any of these documents, each member is notified by a group distribution notice or

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3. is issued a copy of the change. In addition, a master set is maintained with a list of changes made.

The Operations Supervisor's Night Order Book contains information on plant evolutions, unusual occurrences, and major equipment malfunctions. A status of equipment out of commission is maintained by the Station Red Tag Procedures. In addition, the Station Log contains pertinent information on plant equipment, and each operator is required to read the log prior to coming on shift.

4. Every effort will be made to ensure that all operators perform reactor startups and shutdowns, plant conditions permitting. Each operator has a folder for the express purpose of recording training evolutions completed other than the formal course of instructions. The operators' abilities will be observed and evaluated by the Station Shift Supv. or other qualified members of the staff, as often as possible.
5. Each shift crew is required to "walk through" the Emergency Procedures on a continuing basis to maintain the highest operator proficiency. Periodically, a simulated drill will be imposed and the shift crew performance evaluated. The formal classroom lecture series will also discuss the Emergency Procedures as well as plant response characteristics during a major accident.
6. Periodic fire and/or evacuation drills have and will be conducted. These drills are normally unannounced so that a degree of realism can be injected and personnel response observed. The Station Superintendent is normally the evaluator during these drills. Niagara Mohawk conducts its own fire school in the local area of the Station. Everyone permanently assigned to the Station has received a one-week course in fire fighting. It is anticipated that each Station Shift Supervisor will receive a refresher course in fire fighting at least every two years.
7. As presently structured, the retraining program is wholly within the Niagara Mohawk Power organization. If assistance becomes necessary, it will be employed.
8. The audio-visual training aids consisting of video tapes are utilized in both the classroom and as a self-study program. The entire course, "Physics for Reactor Operator," consisting of 21 fifty-minute tapes is available, as well as tapes on major systems such as Control Rod Drive, Rod Worth Minimizer, and the Neutron Monitoring System. Various subjects of continuing interest have been recorded here at the Station for use in the retraining program. It is anticipated that the video tape recording unit can be utilized during plant evolutions such as startup and shutdown, and Station drills. These tapes will be most valuable to the operator when the plant evolutions are static and the number of startups and shutdowns are limited.
9. As indicated in the A.E.C. Licensing Guide, a senior operator should exhibit more detailed knowledge than that required of an operator. Also, the senior operator will be required to display a more thorough knowledge



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April 15, 1970

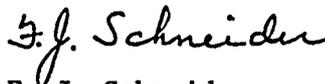
9. of administrative controls and procedures. Thus, although the retraining requirements are quite similar, the minimum acceptable performance of the senior operator is higher than that of a reactor operator. To further illustrate this point, the entire Operating Procedures and Pre-Operational Test Program were written by the Station Shift Supervisors (Senior Operators). They have thus become system "experts" and have been utilized in training reactor operators and will continue to do so.
10. Operators and senior operators are evaluated using several factors, the most important being the rating by his immediate supervisor who observes through daily contact his competence in discharging the duties assigned to his position. Since this evaluation is a summary of the individual's achievements over a period of many months, it should be the best possible indicator of his ability and directly support or reject his application for A.E.C. license renewal.

A second factor used in appraising qualifications for license renewal is successful participation in the retraining program. The lecture series is designed to reiterate the more important aspects of the areas listed in paragraph no. 1. It should keep the individual as mentally ready as the time at which the license exams were first given.

A third facet will be utilized in certifying applications for license renewal. In conjunction with paragraph no. 4 (i.e. startups and shutdowns), each operator will successfully complete at least one reactor startup and shutdown in the presence of the Operations Supervisor or designated assistant. In addition, the Operations Supervisor will conduct a "walk through" with each of the licensed reactor operators to ensure their readiness for licensed renewal.

If there is any doubt concerning an individual's competence from the above guidelines, a comprehensive examination of the scope of the Atomic Energy Commission exam will be given. The outcome from such an examination will indicate an individual's preparedness for relicense.

Very truly yours,



F. J. Schneider
Vice President - Operations

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