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DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests rev to 840719 request for change to Tech Spec 6.3 "Unit Staff Qualifications." Rev should incorporate ref to NUREG-0737,Section I.A.2.1 to clarify requirements for senior reactor operator,as listed in encl.

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O. W. DIXON, JR.
VICE PRESIDENT
NUCLEAR OPERATIONS

November 29, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC

Subject: V. C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Revision to Technical Specification 6.3

Dear Mr. Denton:

In a letter to the NRC Staff dated July 19, 1984, South Carolina Electric & Gas Company (SCE&G) requested a revision to the Virgil C. Summer Nuclear Station Technical Specification 6.3, Subsection 6.3.1, "Unit Staff Qualifications." This change was intended to clarify the educational and experience requirements of candidates for Senior Reactor Operators (SRO's) Licenses and consisted of references to NUREG-0737, "Clarification of TMI Action Plan Requirements," and NUREG-1021, "Operator Licensing Examiner Standards." Based on further review and discussions with the NRC Staff, SCE&G requests that this proposed amendment be revised as detailed below and shown on the attached marked-up Technical Specification page.

SCE&G's current Technical Specifications do not address the experience requirements necessary for a four-year engineering or other applicable science degree holder to obtain an SRO License. At present, NUREG-0737, Section I.A.2.1, and NUREG-1021, ES-109D, both outline the educational and experience requirements for SRO candidates. Therefore, SCE&G requests that a reference to NUREG-0737, Section I.A.2.1, be added to the Technical Specifications to clarify these requirements for SRO candidates. To prevent redundancy, no reference to NUREG-1021 is required as was previously requested in the July 19, 1984 letter.

As previously stated in the July 19, 1984 letter, SCE&G has determined that a finding of no significant hazards is appropriate because the request is consistent with NRC guidance, and is clarifying and administrative in nature.

The revision has been reviewed and approved by both the Plant Safety Review Committee and the Nuclear Safety Review Committee. The application fee required by Title 10 of the Code of Federal Regulations, Part 170 has been transmitted previously under cover of the July 19, 1984 letter.

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If you have any further questions, please advise.

Very truly yours,

O. W. Dixon, Jr.

OWD:rh

Attachment

cc: V. C. Summer
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E. H. Crews, Jr.
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R. A. Stough
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J. B. Knotts, Jr.
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NPCF
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6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

FUNCTION

6.2.3.1 The ISEG shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving plant safety.

COMPOSITION

6.2.3.2 The ISEG shall be composed of a multi-disciplined dedicated onsite group with a minimum assigned complement of five engineers or appropriate specialists.

RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

AUTHORITY

6.2.3.4 The ISEG shall make detailed recommendations for procedure revisions, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to the Group Manager, Technical Services. 18

6.2.4 SHIFT TECHNICAL ADVISOR

The Shift Technical Advisor shall provide technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering and plant analysis with regard to the safe operation of the unit.

as clarified in NUREG 0737, Section I.A.2.1

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 letter to all licensees, except for the Associate Manager, Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, the Shift Technical Advisor who shall meet or exceed the qualifications referred to in Section 2.2.1.b of Enclosure I of the October 30, 1979 NRC letter to all operating nuclear power plants, and the members of the Independent Safety Engineering Group, each of whom shall have a Bachelor of Science degree or registered Professional Engineer and at least two years experience in their field. At least one year experience shall be in the nuclear field. 18

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with identified relevant industry operational experience.

*Not responsible for sign-off function.