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SUBJECT: Responds to 8860213 Generic Ltr 86-04, "Policy Statement on Engineering Expertise on Shift." Shift technical advisors rotate onto & are active participants w/operations shift, per NUREG-0737, Item I. A. 1. 1.

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May 30, 1986
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Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
RESPONSE TO GENERIC LETTER 86-04: POLICY STATEMENT
ON ENGINEERING EXPERTISE ON SHIFT

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

Dear Mr. Keppler:

This letter responds to Generic Letter (GL) 86-04, "Policy Statement on Engineering Expertise on Shift," dated February 13, 1986. GL 86-04 requested that we transmit our plans regarding modifications to our current experts on shift program in light of options now available as a result of the new policy statement on this topic. Included in this letter is the response to that request.

In the subject policy, stress is placed on the importance of providing engineering and accident assessment expertise on shift. It is our understanding the Commission prefers a SRO/STA position. Two options are stated as acceptable in the policy statement:

"<u>Option 1: Combined SRO/STA Position</u>

This option is satisfied by assigning an individual with the following qualifications to each operating shift crew as one of the SROs (preferably the Shift Supervisor) required by 10 CFR 50.54(m)(2)(i):

a. Licensed as a senior operator on the nuclear power unit(s) to which assigned, and

b. Meets the STA training criteria of NUREG-0737, Item I.A.1.1, and one of the following educational alternatives:

(1) Bachelor's degree in engineering from an accredited institution;

(2) Professional Engineer's license obtained by the successful completion of the PE examination;

(3) Bachelor's degree in engineering technology from an accredited institution, including course work in the physical, mathematical, or engineering sciences;

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(4) Bachelor's degree in a physical science from an accredited institution, including course work in the physical, mathematical, or engineering sciences.

Option 2: Continued Use of STA Position

This option is satisfied by placing on each shift a dedicated Shift Technical Advisor (STA) who meets the STA criteria of NUREG-0737, Item I.A.1.1. The STA should assume an active role in shift activities. For example, the STA should review plant logs, participate in shift turnover activities, and maintain an awareness of plant configuration and status."

It is our understanding either Option 1 or 2 may be used on shift. In other words, a utility may use Option 1 on some shifts, and Option 2 on other shifts, or may use the same option on every shift. If Option 1 is used, then the separate STA position may be eliminated for that shift.

The following are responses to your specific questions.

"1. Your current program for providing engineering expertise on shift"

Response: D. C. Cook Plant STAs rotate onto and are active participants with the Operations shifts. Currently there are ten Qualified STAs, with five on shift, and five available for non-shift related activities. In addition, three STAs have successfully passed the SRO examination, two are in training for the SRO examination, and an additional four successfully completed the RO examination. While on shift, the STAs perform the following activities:

(1) Perform immediate investigation of selected Condition Reports.

(2) Conduct turnovers, review logs, and keep current in the status of the plant.

(3) Perform routine tours of the plant.

(4) Follow control room activities during plant maneuvers, such as set-up, start-up, power changes, cool-down, and degassing.

(5) Provide on shift accident assessment as required by NUREG-0737.

(6) Advise the Shift Supervisors on engineering, safety, reportability and compliance issues.

For qualified STAs not attached to an operational shift, the following principal duties are completed:

(1) Review and condense information from all reactor trips.

(2) Participate in meetings with AEPSC and fuel vendor personnel to discuss reload safety analyses.

(3) Coordinate plant participation in Technical Specification amendment preparation and implementation.

(4) On a part-time basis, spend time in the Corporate Safety and Licensing office assisting with selected safety and licensing issues.

(5) Collect and collate data for trending and presentation for further analysis.

(6) Perform immediate reviews and coordinate responses to INPO, Significant Operating Event Reports, and Significant Event Reports.

"2. If your current STA program utilizes an 'equivalency' criteria to an engineering degree, a description of the criteria used"

Response: Equivalency criteria will not be used at the Cook Plant. Educational alternatives, as described in Option 1, b., will be followed.

"3. A description of any modifications you intend to propose to your current program in order to take advantage of the options identified in the Commission's Policy Statement"

Response: The Cook Plant will implement both Option 1 and/or Option 2 as stated above. No modifications of these Options are requested at this time.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,

M. P. Alexich
Vice President

MPA/pm
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