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June 7, 1984

50-258

Florida Power and Light Company
ATTN: Mr. J. W. Williams, Jr.
Group Vice President
Nuclear Energy Department
P. O. Box 14000
Juno Beach, FL 33408

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Gentlemen:

SUBJECT: EQUIVALENT COLD LICENSE TRAINING PROGRAM

This is in response to the letter from Mr. W. C. Miller, Training Supervisor, Turkey Point, to Mr. B. A. Wilson, Operator Licensing Section, Region II, dated April 25, 1984 (PTP-TRNG-84-153). Mr. Miller concluded that the Turkey Point Hot License Program was equivalent to a Cold License Applicant Training Program for the purpose of determining examination eligibility for previously unlicensed (instant) Senior Reactor Operators.

We have reviewed Mr. Miller's letter and find that we require additional information before we can conclude that the Turkey Point Hot License Program meets the requirements for equivalency. The additional information requested is described in the enclosure to this letter. Comments on the training program described in Mr. Miller's letter, and a description of the additional information we need to complete our review are enclosed.

Sincerely,

(Original signed by HCDance
Hugh C. Dance, Chief
Reactor Projects Branch 2
Division of Reactor Projects

Enclosure:
Request for Additional Information

cc w/encl:
K. N. Harris, Vice President
C. J. Baker, Plant Manager

APP

bcc w/encl:
Harold R. Booher, NRR
Document Control Desk
State of Florida
NRC Resident Inspector

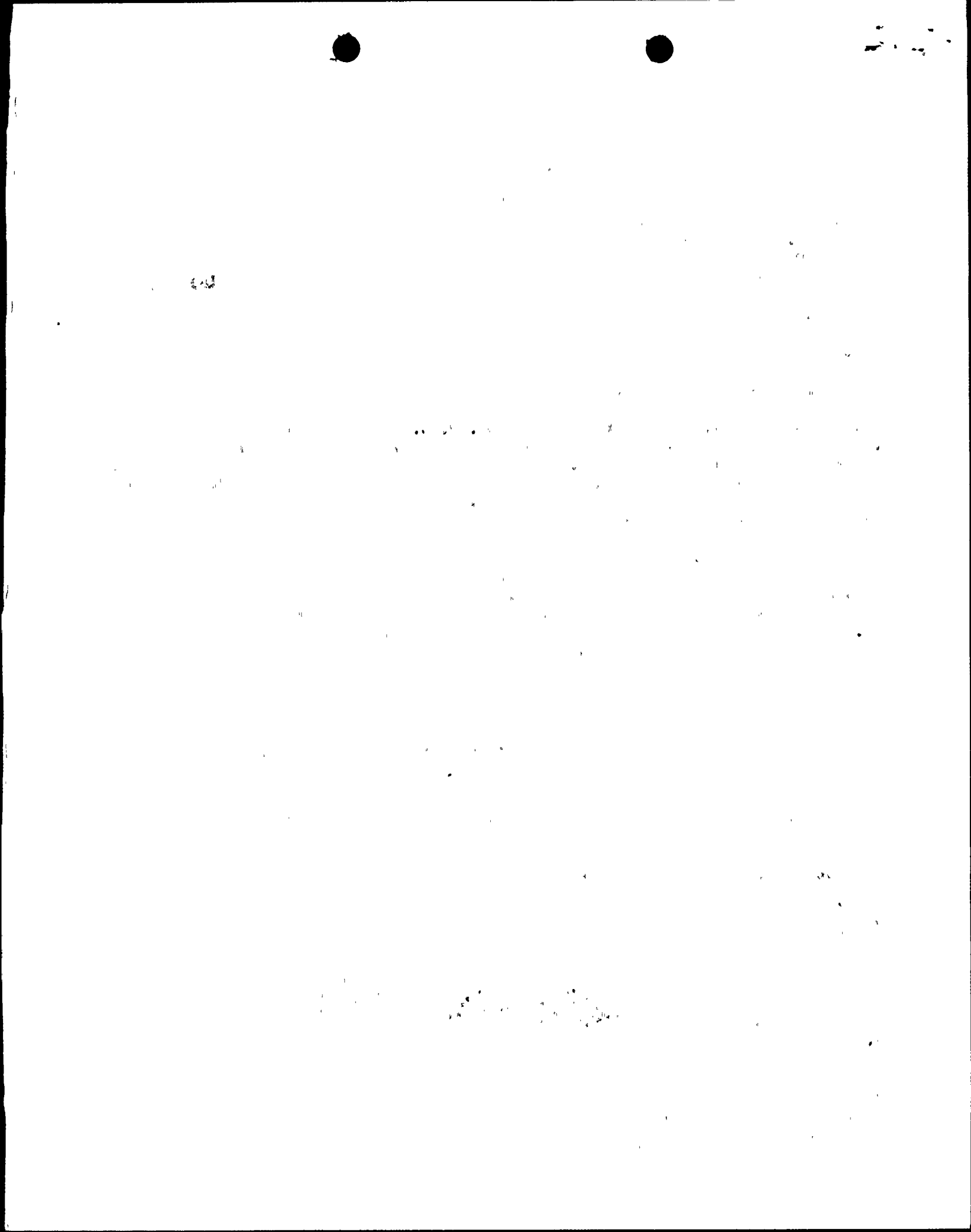
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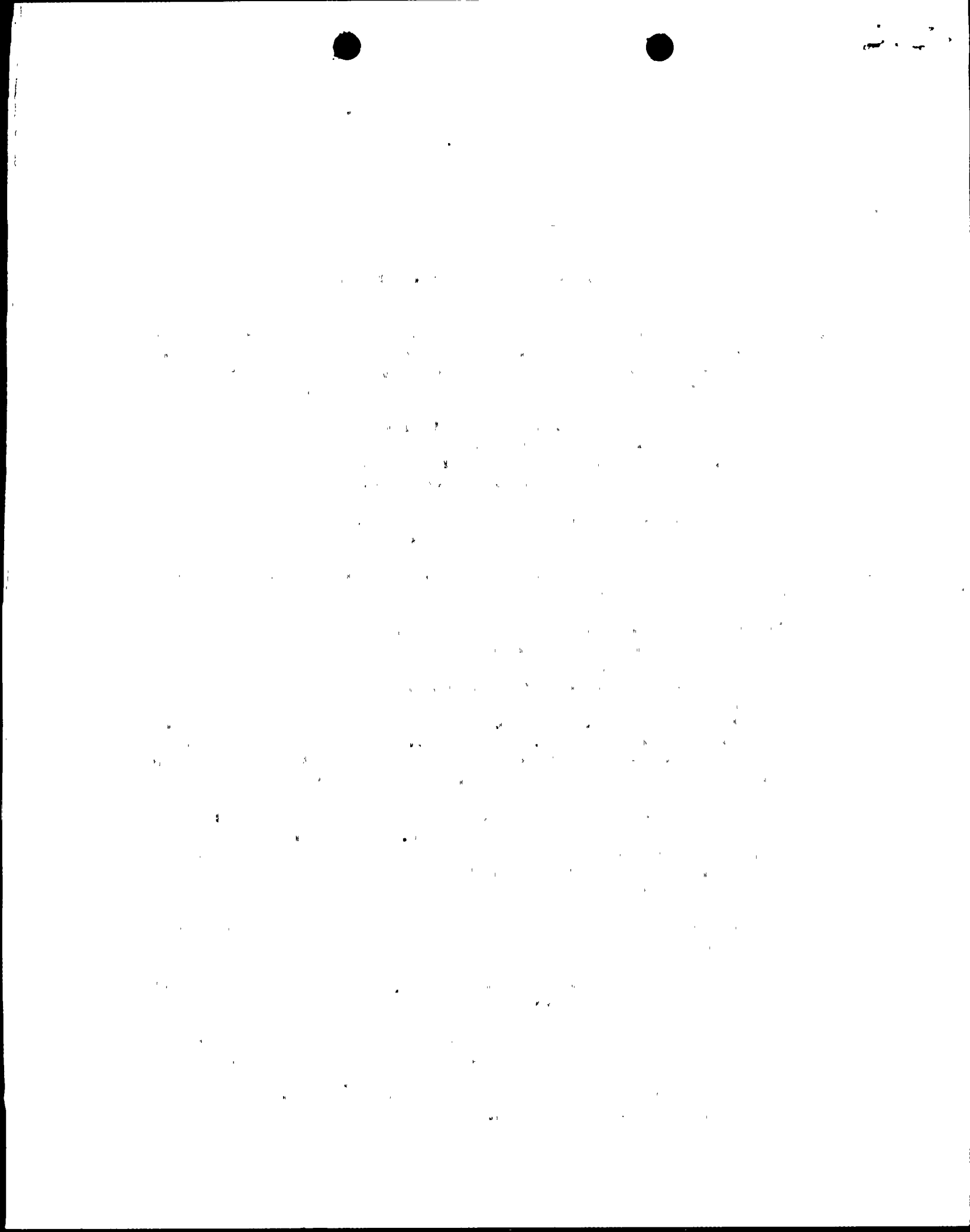
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ENCLOSURE

COMMENTS AND REQUEST FOR ADDITIONAL INFORMATION

- A. We are requesting the following additional information to assist us in our review:
1. A copy of the Turkey Point "Hot License Program" mentioned in your letter. Please submit the latest revision of the program in addition to any submittal letters, correspondence, etc., involved in your response to the Harold Denton letter of March 1980.
 2. A copy of the Startup Certification Training Program conducted at the VEPCO Surry Training Facility which was previously approved by the NRC (Appendix F, NUREG 0094) and a description of any changes which have been made to this program since NRC approval.
 3. If not included in your "Hot License Program," a copy of your day-to-day Observation Training program including approved checklists.
- B. We also have the following comments regarding the information submitted in your letter, PTP-TRNG-84-153.
1. The purpose of requiring ten reactor startups as part of the Basic Fundamentals Course is to enforce the principles of reactor operation taught during the course; thus, the startups are not intended as practice reactivity manipulations. Therefore, you should address how the learning objectives to be gained during the ten research reactor startups are accomplished in the equivalent phases of your program. This will require justification in addition to your statement, "The simulator reactor startups are equivalent to actual startups at Turkey Point from the standpoint of training benefits gained."
 2. NUREG-0737 requires all "hot" license candidates to spend three months on-shift in training as an extra person. This training fulfills the equivalent cold license requirement of day-to-day observation. However, this phase of the training for hot candidates must meet the following criteria:
 - ° It must be structured and supervised by a knowledgeable individual.
 - ° Satisfactory performance must be certified based on observation by a knowledgeable individual.
 - ° Actual plant reactivity manipulations performed should be documented to meet the Appendix F, NUREG-0094 requirement.
 - ° It must be at the appropriate level for which the candidate seeks a license, i.e., RO or SRO.



3. The simulator phase of the program should be a minimum of one week in duration for a Reactor Operator (Appendix F, NUREG-0094) and one month for a previously unlicensed Senior Reactor Operator Candidate (Appendix A, ANS-3.1, 1978). The additional time required for SROs is intended to satisfy the requirements of "equivalent cold license training program" (NUREG-0737) and meets, in part, the requirement of extensive actual operating experience.

4. The Turkey Point design lecture series appears to meet the guidance of Appendix A of ANS-3.1, 1978. However, you must insure that all instructors who teach systems courses (in addition to integrated responses, transient and simulator courses) are, or have been, SRO licensed or Instructor Certified by the NRC.

