

April 3, 2019

PG&E Letter DCL-19-027

Ho Nieh, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

10 CFR 55.11
10 CFR 55.31(a)(3)
10 CFR 55.33(a)(2)

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Supplement to Request for Exemption from Operator Written Examination and
Operating Test

Reference:

1. PG&E Letter DCL-19-017, "Request for Exemption from Operator Written Examination and Operating Test," dated March 7, 2019

Dear Mr. Nieh:

In Reference 1, Pacific Gas and Electric Company (PG&E) requested an exemption from the requirements of 10 CFR 55.33(a)(2) and 55.31(a)(3) on behalf of a former Diablo Canyon Power Plant (DCPP) senior reactor operator (SRO) license candidate. The individual had left PG&E after successfully passing the NRC written examination and operating test. The individual has since been rehired by PG&E at DCPP. The purpose of the requested exemption is to allow his existing NRC written examination and operating test pass results to be recognized for purposes of the issuance of an SRO license for DCPP Units 1 and 2 in accordance with 10 CFR 55.33, "Disposition of an initial application."

This letter provides supplemental information in support of the PG&E exemption request in Reference 1.

DCPP Departmental Administrative Procedure TQ2.DC2, "Initial Licensed Operator Training Program" (currently Revision 26), provides direction on "Operator Transition (Post NRC Exam) Activities." The transition activities include completion of an SRO job familiarization guide (JFG), entitled "Shift Foreman (SFM) Job Familiarization Guide," Course Number LSUPCARD (currently Revision 18), prior to standing watches independently. Upon receipt of the SRO license, the individual will be required to complete this JFG. Among other things, the JFG requires the following:



- The individual must complete six 12-hour watches (72 hours total), performing the functions of an SFM under the direction of a licensed SRO. This 72-hour requirement exceeds the criterion in 10 CFR 55.53(f)(2) that the individual complete "a minimum of 40 hours of shift functions under the direction of an operator or senior operator as appropriate and in the position to which the individual will be assigned."
- The individual must demonstrate the ability to perform shift turnover, including generation of the shift turnover log and use of the shift turnover checklist. This requirement satisfies the criterion in 10 CFR 55.53(f)(2) that the 40 hours of shift functions under the direction of an SRO include "all required shift turnover procedures."

Concurrently, the individual will be required to complete PG&E's "SRO License Reactivation" checklist prior to standing watches independently. This checklist is Attachment 18 of DCPD Departmental Administrative Procedure OP1.DC10, "Conduct of Operations" (currently Revision 55). This checklist requires the individual to complete a plant tour of Units 1 and 2 with a licensed SRO. This plant tour satisfies the criterion in 10 CFR 55.53(f)(2) that the 40 hours of shift functions under the direction of an SRO include "a complete tour of the plant."

PG&E makes no new or revised regulatory commitments (as defined by NEI 99-04) in this letter.

If the NRC requires additional information regarding this matter, please contact Mr. Adam Peck, Director, Operations Services, at 805-545-6675.

Sincerely,

James M. Welsch
Vice President Nuclear Generation and Chief Nuclear Officer

jmsp/4927

cc: Scott A. Morris, NRC Region IV Administrator
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