

SEP 20 1978

Ch. ...
POOR ORIGINAL

Docket Nos. 50-416/417

MEMORANDUM FOR: J. F. Stolz, Chief, LWR Branch #1, DPM
FROM: P. F. Collins, Chief, Operator Licensing Branch, DPM
SUBJECT: RESPONSE TO REVIEW PLAN ASSIGNMENT
REVIEW OF CONDUCT OF OPERATION (SECTIONS 13.2 AND 13.5)
PLANT NAME: Grand Gulf Nuclear Station
DOCKET NOS: 50-416/417
LICENSING STAGE: OL Complete
BRANCH AND PROJECT MANAGER REQUESTING ASSISTANCE: LWR 1, C. Thomas
REVIEW BRANCH INVOLVED: DPM:DLB
REQUESTED COMPLETION DATE: September 22, 1978
DESCRIPTION OF REVIEW: Review of Conduct of Operations, Sections 13.2
and 13.5
REVIEW STATUS: First Round Questions

We have reviewed Sections 13.2 and 13.5 of the FSAR. Based on our review, we have determined that the additional information, identified in the enclosure, is necessary for us to complete our review. We will be available to discuss these items, should the applicant so desire.

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P. F. COLLINS
Paul F. Collins, Chief
Operator Licensing Branch
Division of Project Management

Enclosure:
Attachment A

cc: see next page

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cc: w/enclosure

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DATE	7/14/78	7/14/78			

ATTACHMENT A

440.0 OPERATOR LICENSING BRANCH

440.1
(NONE)

Provide the number of persons who will be trained for licensing pursuant to Section 55.25 of 10 CFR Part 55. The number of persons for whom training is planned in preparation for senior operator and operator examinations prior to criticality should be sufficient to assure that applicable technical specifications conditions with respect to the number of licensed operators on shift crews can be met from the time of initial fuel loading. Due allowance should be made for examination contingencies and the need to avoid planned overtime for supervisory personnel during the startup phase.

440.2
(NONE)

Provide contingency plans for additional training for individuals to be licensed prior to criticality in the event fuel loading is subsequently delayed following completion of the formal training portion of the program.

441.1
(13.2)

Provide a detailed description of the fire protection training and retraining for the initial plant staff and replacement personnel so that the findings addressed

in Paragraphs II.6.A-E of Section 13.2 of NUREG-75/087 (Rev. 1), "Standard Review Plan..." can be made.

441.2
(13.2.1)

Figure 13.2-1 indicates that, at this point in time, essentially all of the training schedule has been completed. The descriptive material, however, implies that only the Basic Nuclear Course has been completed. Specifically identify which courses have been conducted to date and correct Figure 13.2-1, if needed.

441.3
(13.2.2)

What is the duration of the GGNS Technology Course and what organization is responsible for teaching it?

441.4
(13.2.2)

What facility or facilities will be used for the BWR Observation Training described in Paragraph 13.2.2.1.5? Describe the supervision that the trainees will receive during this phase of training.

441.5
(13.2.2)

Does the applicant have any alternative plans for simulator refresher training as described in Paragraph 13.2.2.1.6 if the GE BWR-6 simulator is not operational. We believe it to be highly desirable that individuals who will sit for a license examination prior to criticality participate in a short simulator course immediately prior to the

examination. In addition, for scheduling purposes, the applicant should understand that license examinations are administered within two months of fuel loading, not 5 or 6 months prior as shown on Figure 13.2-1.

441.6
(13.2.2)

The licensed operator requalification program described in Paragraphs 13.2.2.2, 13.2.2.2.1, 13.2.2.2.2 and 13.2.2.2.3 must include additional detail. The applicant may wish to consult ANSI/ANS-3.1-1978, "American National Standard for Selection and Training of Nuclear Power Plant Personnel", which contains an acceptably detailed requalification program. In any event, the program description must specify:

1. That the minimum of lectures is 6, spaced throughout the year and taking into consideration heavy vacation periods and infrequent operations such as forced outages, etc;
2. the specific reactivity manipulations for which credit will be taken;
3. that the emergency and abnormal procedures review will be conducted annually;
4. that the minimum acceptable grade on a periodic examination is 80%;
5. that the annual examination will be comparable in scope and degree of difficulty to an NRC examination

consistent with the type of license held;

6. that a licensee scoring less than 80% in a category of the annual examination shall be required to attend lecture(s) in that subject;
7. that an individual scoring less than 70% overall on the annual examination shall be removed from licensed duties and placed in an accelerated requalification program and that the individual shall score at least 70% on any written reexamination prior to return to licensed duties;
8. that each licensed operator shall receive a performance evaluation annually;
9. that individuals who maintain licenses for the purpose of providing backup capability shall, as a minimum, participate in the requalification program as follows:
 - a. Be administered the annual written examination and participate in the lecture series based on the results thereof;
 - b. manipulate the controls or supervise the manipulation of controls through 10 reactivity changes;
 - c. systematically review design changes, procedure changes and facility license changes;
 - d. systematically review the contents of all abnormal and emergency procedures on a regularly scheduled basis;

- e. be systematically evaluated regarding actions to be taken during simulated abnormal and emergency conditions by a walk through of the procedural steps.

441.7
(13.2.3)

In addition to the retraining program for licensed personnel, a description of the retraining of other position categories on the plant staff should be provided. The description should include the nature, scope and frequency of such retraining. As a minimum, refresher training for non-licensed personnel should be periodic and not less than biennial and should include as a minimum refresher instruction on administrative, radiation protection, security and emergency procedures.

441.8
(13.2)

Describe the means for evaluating the training program effectiveness for each employee. For applicants for license examinations prior to criticality, the means employed to certify that each applicant has had extensive actual operating experience pursuant to Section 55.25(b) of 10 CFR Part 55.

442.1
(13.5)

Provide a schedule for the planned completion of procedure development. A generally acceptable target date

for completion of administrative, operating and emergency procedures is six months before fuel loading. Familiarization with these procedures is an an essential part of the staff training program, including preparation for cold operator license examinations; therefore, procedure preparation should be completed in a timely manner.

442.2
(13.5)

A statement is made that "Section 13.4 additionally defines types of procedures or instructions requiring Plant Safety Review Committee review." Section 13.4.2.d, Responsibility - Plant Safety Review Committee, makes no mention of procedure review. Please clarify this apparent discrepancy.

442.3
(13.5.1)

Indicate your intention to provide Fire Protection Procedures.

442.4
(13.5.1)

This section of the FSAR should include a diagram of the control room area which indicates the area designated "at the controls".

442.5
(13.5.3)

Indicate your intention to provide Radioactive Waste Management Procedures and Materials Control Procedures.