

POOR ORIGINAL MAY 19 1972

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FUEL HANDLING ACTIVITIES

PROBLEM:

It has come to our attention that utilities have made, or are considering making, arrangements with various contractors to perform fuel handling activities at their nuclear power stations. We do not know the extent of this practice, nor the responsibilities delegated by each licensee to the contractors. Also, we are unaware of the qualifications of the individuals who are performing the tasks and the degree of licensed supervision they are receiving when performing the fuel handling activities.

The Directorate of Regulatory Operations has been informed of the situation and his staff is conducting an investigation into the arrangements that have been made. They have requested that we provide a position regarding operator and senior operator license requirements for fuel handling crews.

DISCUSSION:

In 1969 we developed the following policy regarding operator and senior operator license requirements at multi-unit stations for fuel handling crews at Commonwealth Edison Stations.

1. The fuel handling foreman shall be a licensed senior operator. In accordance with the scope of responsibilities and authorities that were described for this position, the license was limited, pursuant to 10 CFR 55.31(c), to those controls associated with his duties.

The corresponding scope of our examination for this license included those areas of knowledge and skills appropriate to fuel handling and related activities.

2. The members of the fuel handling crew need not be licensed, but shall be adequately qualified consistent with their job responsibilities. The facility licensee shall certify that each individual is competent, evidenced by successful completion of a training program as described in their proposal.
3. The fuel handling foreman shall be present and directly supervise the fuel handlers when work is being performed that could affect the reactivity of the reactor. The fuel handling foreman shall perform general supervision of the other operations involving the handling of fuel.
4. A licensed operator shall be present in the control room and in direct communication with the fuel handling crew when work is being performed that could affect the reactivity of the reactor.
5. Detailed procedures shall be used when performing the above tasks.

RECOMMENDATIONS:

We recommend that the same policy be adopted for contracted fuel handling crews with the following exceptions.

1. That the fuel handling foremen be required to hold an unlimited senior operator's license for the facility involved.

Our policy regarding the Commonwealth Edison fuel handling crews was based, in part, on the fact that the individuals involved were CE employees assigned to the multi-unit

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stations. Hence, we had reasonable assurance that they would be cognizant of all applicable operating and administrative procedures and revisions; facility evacuation and emergency plans and equipment design changes applicable to that facility. In addition, we had reasonable assurance that the individuals would be continuously engaged in the receipt, inspection, handling and shipping of fuel. Consequently, they would be maintaining competence in this area of station operations.

We believe we could not have the above assurances at single-unit facilities if we issued limited licenses to contractor personnel unless we conducted examinations prior to each refueling. Consequently, we believe it would be best to require that the foreman be an individual continuously assigned to the facility and who has demonstrated to us his knowledge regarding the facility, its procedures and its Technical Specifications by successfully completing the senior operator examination. Also, we will have reasonable assurance the individual will be maintaining his competence through participation in approved requalification programs.

2. That the facility licensee administer approved training programs to the contractor fuel handling crews. Evidence that each member of the crew has successfully completed the training program should be submitted to Regulatory prior to the start of each refueling.

This requirement would give us the necessary assurance that only properly trained individuals were performing the tasks.

3. That the facility licensee determine that each individual in the fuel handling crew is physically capable of performing the assigned tasks.

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We believe it is reasonable that the facility licensee assure that each individual has the necessary dexterity, visual acuity and hearing to perform the assigned tasks and that there is reasonable assurance that the individual will not become suddenly incapacitated while performing the fuel handling tasks.

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