SEP 26 1974

Docket No. 50-346

I. Peltier, Project Manager, Light Water Reactors Branch 2-3, L

DAVIS-BESSE I OPERATOR REQUALIFICATION PROGRAM

We have reviewed the Davis-Besse I FSAR in which the operator requalification program is described. Based on our review, we have concluded that the revisions indicated in Attachment A are necessary to bring the program into conformance with previously approved requalification programs. Attachment B contains a list of acceptable control manipulations for meeting the 10 reactivity control manipulations required in paragraph 3a of Appendix A to 10 CFR Part 55. In order that we may complete our review, please request the applicant to submit a revised program within thirty days of the date of this letter.

ORIGINAL SIGNED BY
P. F. COLLINS

Paul F. Collins, Chief
Operator Licensing Branch
Directorate of Licensing

Enclosures:
1. Attachment A
2. Attachment B

cc: A. Schwencer

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ATTACHMENT A
DAVIS-BESSE I
DOCKET NO. 50-346

1. The program should indicate that upon completion of the program, the program will be promptly followed, pursuant to a continuous schedule, by successive requalification programs.

2. The reactivity manipulations for which credit will be taken must be specified. An acceptable list of manipulations for PWR's appears in Attachment B. Additionally, a statement must be included that indicates an effort will be made to have an individual perform a combination of manipulations during any two year requalification program.

3. The applicant should provide the details of the implementation of the on-the-job training. Specifically, the information should include the frequency of procedure reviews, who will conduct the evaluation and the documentation that will be maintained. Sufficient information should be included to show how the requirements of Paragraphs 3b, 3c, 3d and 4c of Appendix A of 10 CFR Part 55 will be met.

4. The requalification program must provide for an annual written examination comparable to an AEC examination consistent with the type of license held. In addition, the program must provide a grade criterion for determining that an individual should participate in an accelerated requalification program pursuant to Paragraph 4e of Appendix A. A grade of less than 70% overall on the annual written examination has been established as requiring mandatory participation in an accelerated requalification program. The program should contain a provision that an individual enrolled in an accelerated requalification program shall not perform licensed duties until he has successfully completed the accelerated program. The scope and duration of the accelerated program should be based on the individual's demonstrated deficiencies.

5. The schedule of lectures should be provided. The minimum number of lectures in any calendar year should not be less than six, evenly spaced throughout the year and taking into consideration heavy vacation periods and infrequent operations such as, refueling periods. Lectures may be deferred due to unanticipated shutdowns. However, these lectures should be conducted at a later date. Facility management may elect to have all licensed individuals attend every lecture. An alternative to this is to use the results of the annual written examination to develop the lecture series and attendance for the following year. If this latter method is used, the requalification program should contain a grade criterion for exemption from attendance

at a given lecture. The minimum grade acceptable for exemption from attendance at a particular lecture is 80% in that category of the examination. The program should state the method to be used and include the appropriate criteria.

6. The requalification program must include a commitment to administer periodic written examinations pursuant to Paragraph 4b of Appendix A. Further, it has been established in approved programs that an individual scoring less than 80% on a periodic written examination will be required to undergo remedial training in the subject material. This criterion must also be included in your program.

7. The program should specify the extent to which licensed staff members will participate in the requalification program. As a minimum the individuals should:

   1. be administered the annual written examination and attend the lecture series based on the results thereof, if that is the alternative chosen,

   2. manipulate the controls or supervise the manipulations of the controls through 10 reactivity changes,

   3. systematically review the contents of all abnormal and emergency procedures on a regularly scheduled basis,

   4. systematically review design changes, procedure changes and facility license changes, and

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

8. Records of the requalification program shall be maintained to document each licensed operator's and senior operator's participation in the requalification program. The records shall contain copies of written examinations administered, the answers given by the licensee, results of evaluations, documentation of the review of abnormal and emergency procedures and of changes to procedures, facility design and facility license and documentation of any additional training administered in areas in which an operator or senior operator has exhibited deficiencies.

ATTACHMENT B
ACCEPTABLE REACTIVITY MANIPULATIONS FOR A PWR
DAVIS-BESSE I
DOCKET NO. 50-346

1. Startup to the point of adding heat
2. Orderly shutdown
3. Manual control of S/G levels during startup and shutdown
4. Operation of EHC in manual during startup
5. Boration during power operation
6. Dilution
7. Operation of manipulator crane during refueling over the core.
8. Any significant ($>$10%) power charges in manual rod control
9. Manual rod control prior to and during generator synchronization.