

C. J. F. 11

AUG 25 1980

Docket No. 50-282
50-306

Mr. L. O. Mayer, PE
Manager of Nuclear Support Services
Northern States Power Company
414 Nicollet Mall - 8th Floor
Minneapolis, Minnesota 56401

Dear Mr. Mayer:

We have reviewed the Northern States Power Company submittal dated June 11, 1980, in response to Mr. D. Eisenhut's May 7, 1980 letter identifying five new TMI-2 requirements. Our review of your response is based on the criteria established in Mr. Harold Denton's letter dated March 28, 1980, "Qualifications of Reactor Operators".

Based on our review of the information contained in your submittal, we have determined that item (1) "A.1.a. Experience" does not satisfy the criteria for Reactor Operator Training and Licensing. We cannot permit exceptions to be made by the Training Supervisor.

Responsible power plant experience should be that obtained as a control room operator (fossil or nuclear) or as a power plant staff engineer involved in the day-to-day activities of the facility commencing with the final year of construction.

Item (2) - A.2.b. Training - Control Room Operator. The criteria states that applicants should have 3 months training on shift as an extra person in the control room. This means that all applicants must meet the stated criteria. Therefore, your response did not satisfy the requirement of the criteria.

Item (3) - Extension of the effective date from August 1, 1980 to October 1, 1980 is acceptable, based on the fact that at present you have a program in place and you are making modification to upgrade this program.

Item (4) - A.2.d. Training - Instructor Competence. Applications should be submitted by August 1, 1980 so that scheduling of the examinations can be arranged. Therefore, extension of this date of December 1, 1980 is not acceptable.

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Mr. L. O. Mayer

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The criteria for training center and facility instructors who teach systems, integrated responses, transient and simulator courses shall demonstrate their competence to NRC by successful completion of a senior operator examination.

Instructors may be certified in lieu of license i. e., take the examination and receive a passing grade without wanting to receive the license. Also, not all instructors need to be licensed or certified, only those specifically delineated in the criteria.

The fourth paragraph concerning SRO's with lapsed license but still engaged in nuclear power plant operation and/or support activities and have demonstrated their competence to NRC by successful completion of a senior operator examination is acceptable.

In the fifth and last paragraph of Item (4) the exceptions are not acceptable. We can permit no exceptions at this time and reference to the criteria is again suggested.

Item (5) is found to be acceptable.

Item (6) - A.3 Facility Certifications. The purpose of this criteria is to assure the involvement by higher management so as to satisfy a requirement established by NRC as a result of the TMI-2 lessons learned experience. Therefore, the plant manager level of authority to attest to the validity of the license applications is not acceptable. However, how he advises higher management is an inhouse "modus operandi" and does not conflict with the NRC requirements.

Sincerely,

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Paul F. Collins, Chief
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