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SOUTH CAROLINA ELECTRIC & GAS COMPANY

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T. C. NICHOLS, JR.
VICE PRESIDENT AND GROUP EXECUTIVE
NUCLEAR OPERATIONS

January 2, 1981

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

> Subject: Virgil C. Summer Nuclear Station Shift Technical Advisor and Independent Safety Engineering Group

Dear Mr. Denton:

As requested by the NRC, South Carolina Electric and Gas Company (SCE&G) acting for itself and agent for South Carolina Public Service Authority provides forty-five (45) copies of the SCE&G position on TMI items regarding the Training and Qualifications for Shift Technical Advisors and the Independent Safety Engineering Group.

The Shift Technical Advisor (STA) will have a Bachelor's Degree in engineering or related sciences. The STA will receive specific training in the response and analysis of the plant for transients and accidents. The STA will also complete training in plant design and layout, including the capabilities of instrumentation and controls in the control room. This on-site training program will include instruction in PWR reactor theory, plant specific systems, and procedures. The STA will receive specific training in the use of safeguards equipment for the mitigation of core damage in post-accident situations. The STA will complete a simulator training course which will provide a minimum of 100 contact hours consisting of 50 classroom hours and 50 hours on the simulator control board. The STA position requires a minimum of 18 months nuclear power plant experience. The STA will be assigned normal duties that pertain to the engineering aspects of assuring safe operation of the plant, including review and evaluation of operating procedures and operating experience.

The annual requalification program for the STA has not been established. However, the program will include, as a minimum, review of transient and accident analyses of FSAR events emphasizing the STA's role in accident assessment and review of selected industry events and LERs that could have led to more serious incidents. The requalification training will also include a minimum of 24 hours of simulator exercises on the simulator control board.

Should phaseout of the STA program become desireable in the future, phaseout plans will be commensurate with the programs established for upgrading the qualifications of the shift supervisors and senior operators and for upgrading of the man-machine interface in the control room. In addition to the aforementioned programs, the phaseout of the STA program would also depend on the criteria established by the NRC which would make possible the elimination of the STA position.

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The Independent Safety Engineering Group (ISEG) is an independent group consisting of a minimum of five (5) dedicated full-time site based engineers. The ISEG reports directly to the Group Manager, Engineering and Licensing. The ISEG is completely independent of the plant operations staff and provides upper management with an onsite overview of plant operating conditions conducive to safe operation. The ISEG is chartered to evaluate technical aspects of day to day plant activities for safe operation, review safety related procedures, and review plant operations in regard to operating experience including Licensing Event Reports (LER) of facilities of similar design.

Individual ISEG members have six or more years experience in their field of specialty and have attended appropriate operations training or taken college courses in the fundamentals of heat transfer, thermodynamics, fluid flow and dynamics as related to transient analysis.

If you have any questions, please let us know.

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T.C. Nichols, Jr.

## ARK/bsg

cc: V.C. Summer

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