

DEC 22 1989

Docket No. 50-440  
Docket No. 50-441

The Cleveland Electric Illuminating  
Company

ATTN: Mr. Alvin Kaplan  
Vice President  
Nuclear Group

10 Center Road  
Perry, OH 44081

Dear Mr. Kaplan:

SUBJECT: REQUEST TO CANCEL NRC REQUALIFICATION EXAM/PROPOSAL TO UTILIZE  
ANOTHER BWR FACILITY EXAMINATION DATE (REF: PY-CEI/NRR-1077-L)

I am responding to your letter dated October 13, 1989, which requested the cancellation of the February 1990 NRC requalification exam at the Perry Nuclear Power Plant. It is my understanding that your request was based on the fact that the Perry staff has successfully completed two recent NRC requalification exams and adequate examinations can be conducted to ensure all license holders will be examined by the NRC prior to their license renewal dates. Based on a review of the Perry situation I have cancelled the February 1990 requalification examination.

While we are cancelling the February examination, I would like to emphasize that the NRC requalification exam is not only an examination of the operators, for license renewal, it is also an evaluation of the requalification training program. The program evaluation is based on the NRC's need to ensure that all operators are maintaining an acceptable level of performance. Therefore, scheduling such examinations is at our option and is not necessarily based on facility licensee needs. Because of the dual nature of the examination, with emphasis on the program evaluation, a requalification examination has been scheduled for the Perry facility in August of 1990. You should insure that resources are in place to accommodate this. Details will be provided at a later date by Mr. Mike Jordan of my staff.

Your proposal for the NRC to administer an initial examination at Perry in January 1991 was also reviewed. As you know a National Exam Schedule was formulated and was distributed in March of 1989. The purpose of the schedule was to level/spread the work evenly across the year. While facilities with scheduled exams in a given month have priority, this would not out of hand, preclude additional exam being given at Perry if sufficient NRC Region III resources were available.

9001040007 891222  
PDR ADOCK 05000440  
V FDC

1E42

The Cleveland Electric Illuminating Company 2

DEC 22 1989

If you have any questions, please contact me at (708)790-5695.

Sincerely,

ORIGINAL SIGNED BY GEOFFREY C. WRIGHT

Geoffrey C. Wright, Chief  
Operations Branch

cc w/ltr dated 10/13/89:  
F. R. Stead, Director, Nuclear  
Support Department  
M. D. Lyster, General Manager,  
Perry Plant Operations Department  
R. A. Newkirk, Manager,  
Licensing and Compliance Section  
S. F. Kensicki, Director, Perry  
Plant Technical Department  
H. Ray Caldwell, General  
Superintendent Nuclear Operations  
DCD/DCB (RIDS)  
Licensing Fee Management Branch  
Resident Inspector, RIII  
Terry J. Lodge, Esq.  
James W. Harris, State of Ohio  
Roger Suppes, Ohio  
Department of Health  
A. Grandjean, State of Ohio,  
Public Utilities Commission

cc w/o ltr dated 10/13/89:  
K. E. Perkins, OLB

RIII

*(Rau)*  
Rau/jk/cg/lc  
12/13/89

RIII

*Jordan*  
Jordan  
12/22/89

RIII

*Wright*  
Wright  
12/22/89

*Wright*  
12/22/89



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 97 ■ PERRY, OHIO 44081 ■ TELEPHONE (216) 256-3737 ■ ADDRESS-10 CENTER ROAD  
FROM CLEVELAND: 476-1260 ■ TELEX: 241566  
ANSWERBACK: CEI PRYO

Al Kaplan

VICE PRESIDENT  
NUCLEAR GROUP

*Serving The Best Location in the Nation*  
PERRY NUCLEAR POWER PLANT

October 13, 1989  
PY-CEI/NRR-1077 L

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Perry Nuclear Power Plant  
Docket No. 50-440  
Supplemental Information on  
Generic Letter 89-12  
"Operator Licensing Examination"

Gentlemen:

The Cleveland Electric Illuminating Company (CEI) is submitting by this letter a supplement to our August 30, 1989 response to Generic Letter (G.L.) 89-12, "Operator Licensing Examinations" consisting of revised operator licensing and operator requalification examination schedules for the Perry Nuclear Power Plant (PNPP) for 1990 through 1993. These revised schedules are the result of a re-evaluation of our needs with respect to requalification examinations and a commitment to ensure examination of all currently licensed operators prior to their renewal dates.

In the August 30, 1989 response to G.L. 89-12, CEI had requested further evaluation of our proposed operator requalification exam schedule after preliminary communications with Region III indicated that the Region would not be able to support our proposed schedule.

In subsequent communications with our Training Section, Region III established the following positions in regard to operator license examinations: Region III cannot support our proposed operator requalification examination schedule submitted in our August 30, 1989 response to G.L. 89-12; Region III can only administer examinations at PNPP twice a year, beginning in February 1990 and then every August and February thereafter, consistent with the National Examination Schedule provided in G.L. 89-03. Until the differences between the initial operator licensing and requalification examination methodologies are reconciled, the examinations administered at PNPP will consist of one initial and one requalification examination each year. While Region III would consider approval of a third examination date at PNPP if CEI can find another BWR license holder in the Region willing to give up an unused examination date, Region III is less receptive to the rescheduling of an examination to accommodate possible slippage in CEI's replacement simulator installation and training schedule.

In consideration of the above information, CEI committed to re-evaluating our needs with respect to requalification examinations and to proposing an examination schedule that ensures examination of all currently licensed operators prior to their renewal dates.

*89-10-9-0003 4pp.*

OCT 18 1989

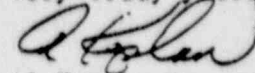
CEI's revised proposed initial operator licensing and requalification examination schedules are provided in Enclosures 1 and 2. Under our revised schedules, CEI proposes only one examination in 1990, an initial operator examination on our August exam date. CEI does not foresee a need for a requalification examination in 1990 since our proposed requalification schedule for 1991 through 1993 will ensure that all currently licensed operators are examined by the NRC prior to their renewal date. Of the 58 employees currently holding operator licenses at PNPP, twenty have already been evaluated by the NRC within the term of their 6-year license. Eight were evaluated during the NRC "Pilot" Requalification Examination administered in May 1988 and twelve during our Annual Requalification Examination administered in June 1989. Of the remaining 38 licensed operators who have not yet been evaluated by the NRC in a requalification examination, eight licenses expire in 1993, five in 1994, and the balance (25) in 1995. These remaining 38 licensed operators will be examined during the 1991 through 1993 Requalification Exam Schedule with approximately 12 to be requalified each year. This schedule ensures that each licensed operator will have the opportunity to participate in two exams prior to the expiration of his license. Foregoing the unnecessary February 1990 examination date should also lessen the burden on the Region's overall examination schedule.

CEI's revised schedule for 1991 proposes three examinations consisting of two initial operator examinations to be conducted in January and August and one requalification examination to be conducted in February. A BWR in Region III has indicated to our training section that they will not be using their January 1991 examination date and that it is available to CEI (written confirmation pending). This third examination will allow CEI to meet our need for additional licensed operators as identified in our response to G.L. 89-12. Our second 1991 initial operator examination date, scheduled for August, also closely follows our replacement simulator installation schedule. While our replacement simulator "ready for training" date currently remains at July 5, 1991, any delay could jeopardize our August examination schedule. For this reason, CEI is currently searching Region III for a BWR licensee with a late 1991 exam date willing to negotiate an exchange for our August date. CEI will keep the NRC informed of any changes to our proposed schedule resulting from this effort.

CEI's revised schedule for 1992 and 1993 will consist of a requalification examination on our February exam date and an initial operator licensing exam on our August exam date. CEI expects that this schedule will remain unchanged thereafter.

If you have any questions, please feel free to call.

Very truly yours,



Al Kaplan  
Vice President  
Nuclear Group

Enclosures

AK/njc

cc: T. Colburn  
P. Hiland  
USNRC Region III  
K. Perkins  
M. Jordan

Enclosure 1

PROPOSED OPERATOR LICENSING EXAMINATION SCHEDULE FORMAT

Facility Perry Plant BWC Region III

FY 1990 (10/1/89-9/30/90)    FY 1991 (10/1/90-9/30/91)    FY 1992 (10/1/91-9/30/92)    FY 1993 (10/1/92-9/30/93)

1. Assigned Date (EL 89-03)	FY 1990	FY 1991	FY 1992	FY 1993
PRO	8/90	1/91*	N/A	N/A
PSRO Instant	9	4	N/A	N/A
PSRO Upgrade	0	8	N/A	N/A
PSRO Limited	4	0	N/A	N/A
PSRO Limited	0	0	N/A	N/A
2. Assigned Date (EL 89-03)	FY 1990	FY 1991	FY 1992	FY 1993
PRO	N/A	8/91**	8/92	8/93
PSRO Instant	N/A	8	8	8
PSRO Upgrade	N/A	0	0	0
PSRO Limited	N/A	4	4	4
PSRO Limited	N/A	0	0	0

Please indicate initial cold license examinations by placing an asterisk (\*) by the date. Please indicate examinations intended to extend an operator's license to a second or subsequent unit with two asterisks (\*\*). (For example, if Unit 1 is in operation and Unit 2 is approaching fuel load, and three RB candidates with no previous license are to be examined on both Units 1 and 2, and five RB candidates licensed on Unit 1 are to be examined to extend their licenses to Unit 2, then indicate "RB 3,5\*\*.")

\* Pending written confirmation from another Region III BWR licensee allowing CEI use of their Unused January examination date.

\*\* CEI currently searching Region III for a BWR licensee willing to exchange 8/91 for a later examination date in order to accommodate our replacement simulator installation schedule.

PROPOSED REQUALIFICATION EXAMINATION SCHEDULE FORMAT

Facility Perry Plant NRC Region III

Planned Simulation Facility Certification/Approval Date 05/17/91 (1)

	FY 1990 (10/1/89-9/30/90)	FY 1991 (10/1/90-9/30/91)	FY 1992 (10/1/91-9/30/92)	FY 1993 (10/1/92-9/30/93)
1.	Date <u>N/A</u>	Date <u>2/91</u>	Date <u>2/92</u>	Date <u>2/93</u>
2.	Date <u>N/A</u>	Date <u>N/A</u>	Date <u>N/A</u>	Date <u>N/A</u>
3.	Date <u>N/A</u>	Date <u>N/A</u>	Date <u>N/A</u>	Date <u>N/A</u>
4.	Date <u>N/A</u>	Date <u>N/A</u>	Date <u>N/A</u>	Date <u>N/A</u>
5.	Date <u>N/A</u>	Date <u>N/A</u>	Date <u>N/A</u>	Date <u>N/A</u>

(1) Manufacturing of a new simulator is underway. CEI plans to file certification documents subsequent to acceptance testing at the vendor facility but prior to on-site ready-for-training.