

NOV 15 1982

Docket No. 50-334

Mr. J. J. Carey, Vice President
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Nuclear Division
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Dear Mr. Carey:

SUBJECT: BEAVER VALLEY UNIT 1 - TMI ACTION PLAN ITEMS I.A.2.1.4,
UPGRADING OF RO AND SRO TRAINING, AND II.B.4.1, TRAINING
FOR MITIGATING CORE DAMAGE

We have reviewed the Technical Evaluation Report prepared by our contractor,
Science Applications, Inc. regarding the subject issues. The contractor's
review was based on your letters dated September 2, 1980 and April 21, 1982.

Our review of the contractor's Technical Evaluation Report, supplemented by
our onsite reviews of your training programs, allowed us to conclude that
the guidance of TMI Action Plan Items I.A.2.1.4 and II.B.4.1 have been met.
The enclosed SER provides details of our review.

Sincerely,
Original signed by:
S. A. Varga

Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Enclosure:
Safety Evaluation Report

cc w/encl:
See next page

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SAFETY EVALUATION REPORT

ITEMS I.A.2.1.4 and II.B.4.1 of NUREG 0737

DUQUESNE LIGHT COMPANY

DOCKET NO. 50-334

1.0 INTRODUCTION

As a consequence of the accident at TMI-2, implementation of a number of new requirements has been recommended for operating reactors. These requirements are described in NUREG-0660, "NRC Action Plan Developed as a Result of the TMI-2 Accident," May 1980, and NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980. The NRC staff has requested licensees to submit information sufficient to permit an independent evaluation of their response to these requirements. This report provides an evaluation of the response to TMI Action Plan items I.A.2.1.4 and II.B.4.1 by Duquesne Light Company (DLC).

2.0 EVALUATION

ITEM I.A.2.1.4

Duquesne Light Company has modified the initial and requalification training programs to include training in areas required by TMI Action Plan Item I.A.2.1.4. The training programs include instruction in heat transfer, fluid flow, thermodynamics and mitigation of accidents involving a degraded core. The training programs provide an increased emphasis on reactor and plant transients.

An NRC staff contractor, Science Applications Incorporated (SAI), has reviewed the licensee's submittals and prepared the attached Technical Evaluation Report. The NRC staff has reviewed this evaluation and concurs in its basis and findings except as noted below.

SAI noted three aspects of this item which apparently did not conform to the NRC guidelines: (1) the training program did not appear to contain increased emphasis in dealing with reactor transients, (2) the requalification training program did not include training in the area of accident mitigation with core damage, and (3) the requalification training program did not include the performance of the required control manipulations identified in Enclosure 4 to the letter from H. R. Denton to all power reactor applicants and licensees, dated March 28, 1980. With regard to item (1), a further staff review of the Beaver Valley Training Manual, Issue 3, dated August 6, 1982 and the Simulator Training schedule identified adequate training in this area. With regard to item (2), an additional staff review was performed of the Beaver Valley Training Manual, Issue 3, which does specify retraining for accident mitigation with core damage.

The Beaver Valley Operator Retraining Manual details training in the following areas which include this topic: "Small Break LOCA-No High Head Safety Injection," "Loss of Feedwater Induced LOCA's," and "Normal and Abnormal Procedure Reviews." SAI's interpretation that 80 contact hours should be devoted to this subject in the requalification training program is not correct. This was meant to apply only to the initial training. Finally, with regard to Item 3, SAI is correct in concluding that the 27 control manipulations specified in Enclosure 4 to the letter from H.R. Denton to all power reactor applicants and licensees are not required by the Beaver Valley Training Manual. An NRC staff review of the Simulator Training schedule identified that all of the manipulations are performed, however, the licensee had not made it a requirement of the training program. The licensee committed to revise Training Manual section 2.2.4.3 to require that all 27 control manipulations be completed either in the Control Room or during annual simulator training.

Implementation of these training programs is subject to verification by the NRC staff.

ITEM II.B.4.1.

Duquesne Light Company has developed a training program to teach the use of installed equipment and systems to control or mitigate accidents in which the core is extensively damaged. The program includes training subjects equivalent to those specified in Enclosure 3 to the letter from H.R. Denton to all power reactor applicants and licensees dated March 28, 1980. SAI had not reviewed the Beaver Valley Training Manual, Issue 3, and had concluded that this training program did not provide 80 contact hours of instruction in this subject area. For licensed operators the training was to conform to Enclosures 2 and 3 to the H.R. Denton letter of March 28, 1980. A staff review of the Beaver Valley Training Manual indicates that either 68 hours (training Option I) or 180 hours (training Option II) are devoted to the subjects of heat transfer and fluid flow. When combined with the 24 hours for Mitigating Core Damage training, either option is in excess of the 80 hour guideline. Non-licensed personnel are only required to receive the training specified in Enclosure 3 to the H.R. Denton letter, and the 80 hour guideline does not apply.

This completes the action required by Item II.B.4. However, future changes to the facility such as the installation of additional post accident monitoring instrumentation, should be reflected in revisions to the training program.

3.0 CONCLUSIONS

The information submitted by Duquesne Light Company, supplemented by onsite staff reviews of training programs for upgrading RO and SRO training and for training for mitigating core damage, provided sufficient detail to conclude that the requirements of TMI Action Plan Items 1.A.2.1.4 and II.B.4.1 have been met.

Principal Contributor: W. Lazarus