

23 DEC 1981

MEMORANDUM FOR: L. L. Wheeler, Project Manager, Branch No. 3, Division of Licensing, NRR

FROM: R. M. Gallo, Chief, Reactor Projects Section 1A, DRPI, Region I

SUBJECT: SEABROOK STATION FSAR QUESTIONS FOR SECTIONS 13.1.2, 13.2, 13.4 AND 13.5.1

Enclosed are the questions developed as a result of Region I's preliminary review of Seabrook Station FSAR Sections 13.1.2, 13.2, 13.4 and 13.5.1.

If you have any comments, please advise me.

Original Signed By:

Robert M. Gallo, Chief
Reactor Projects Section 1A

Enclosure: As stated

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Questions For FSAR Section 13.1.2

- 630.6 Regarding the Operations organization described in FSAR Sections 13.1.2.1 and 13.1.2.2.b:
- (a) Commit to a five shift crew rotation or demonstrate that remaining in four operating crews will not result in excessive overtime situations for your staff.
 - (b) Clarify the position of the Assistant Operations Manager in the line of succession to the Station Manager's authority.
- 630.7 Regarding the Technical Services organization described in FSAR Section 13.1.2.2.c:
- (a) Describe the duties, responsibilities and authority of the Assistant Technical Services Manager.
 - (b) Describe the extent of involvement of the Technical Services organization in the Initial Test Program.
- 630.8 Regarding FSAR Section 13.1.2.2.d, describe the Training staff's capability to conduct general employee, radiation protection and non-licensed personnel technical training. Include a discussion of the number of people assigned to the Training staff and describe their qualifications.
- 630.9 Regarding Shift Staffing as described in FSAR Section 13.1.2.3 and in Proposed Technical Specification 6.2:
- (a) Commit to having a rad/chem technician onsite at all times when a unit is in Modes 1-4 or justify not doing so.
 - (b) Commit to having a Shift Technical Advisor who meets the requirements and qualifications discussed in Item I.A.1.1 of NUREG-0737 onsite at all times when a unit is in Modes 1-4.

Questions For FSAR Section 13.1.3

- 630.10 Regarding the qualifications of plant personnel described in FSAR Section 13.1.3:
- (a) Neither the Station Manager nor the Assistant Station Manager appears to have indepth experience in the overall management of an operating commercial nuclear power plant. Describe the steps you are taking to provide this experience for the senior plant staff.
 - (b) For the Technical Services organization:
 - (i.) Describe, in detail, the experience of the incumbent Maintenance Department Supervisor in the electrical maintenance area and discuss his knowledge of applicable electrical codes.
 - (ii.) Describe, in detail, the qualification and experience of the Electrical Supervisor.
 - (iii.) Describe the steps you have taken to ensure an adequate level of electrical experience within the Maintenance Department.
 - (iv.) Explain why the designated level of qualification listed in this section for the Instrumentation and Control Department Supervisor is "Proffessional-Technical" instead of "Supervisor Not Requiring an NRC License."
 - (c) Although the incumbent Training Manager has an extensive background in the field of education, he appears to lack specific experience in the area of nuclear power plant training. Describe the steps you have taken to provide this specific experience within the Training Organization.

Questions For FSAR Section 13.2 (SER 13.2.2)

- 630.11 Describe, in detail, your Shift Technical Advisor (STA) training program. Include in your description:
- a. The approximate duration in weeks for each segment of the program.
 - b. The number of STA's being trained and the current position titles for these STA's.
 - c. A comparison of the STA training program to the program described in Appendix C of NUREG-0737.
 - d. Milestone date, in months prior to Fuel Load, for completion of your initial STA training program.
 - e. A discussion of the STA retraining and replacement training program.
 - f. A discussion of the remedial training requirements for an STA who has been absent from STA duties for a period of 30 days or longer.
- 630.12 Describe your plans for conducting the Position Task Analysis program discussed in Item I.A.2.2 of NUREG-0660.
- 630.13 Figure 13.2-1 shows the training milestone dates for Licensed Operator Training. Provide a chart similar to Figure 13.2-1 which shows the training milestones for each of the other major organizational units discussed in FSAR Section 13.1.2.
- 630.14 Provide information showing the extent of completion of each of your training programs as of January 1, 1982 and discussing your contingency plans for these programs if the Fuel Load date is significantly delayed.
- 630.15 Explain the methods you will use to evaluate the effectiveness of the STA and non-licensed training programs and to provide an evaluation of each employee involved.
- 630.16 Regarding the non-licensed personnel training program described in FSAR Section 13.2.1.1.d:
- a. Elaborate on the training you will give to supervisors and technical personnel. Include in your discussion, the course content, duration in weeks for each major segment, the teaching organization and the number and position titles of the expected trainees.

- b. Similarly, describe the training which you will give to the technicians and craftsmen in your Technical Services organization.
- c. Describe the Auxiliary Operator training program.

630.17 Describe your training given in response to Item II.B.4 of NUREG-0737 "Training For Mitigating Core Damage" include:

- a. A syllabus or description of course content.
- b. The number and position titles of the trainees.
- c. Identification of the teaching organization.
- d. A differentiation between the classroom and on-the-job training aspects of the program.
- e. The retraining and replacement training provisions for the program.
- f. A description of the program evaluation mechanism.

Questions For FSAR Section 13.4

- 630.18 In regard to the description of the facility's Review and Audit Program presented in Section 13.4 provide the details pertaining to the Review and Audit Program developed in accordance with the guidelines of ANSI N18.7-1976 as endorsed by Regulatory Guide 1.33.
- 630.19 In regard to the discussions of the On Site Review Committee in Section 13.4.1, provide the following:
- (a) A description of the Committee's charter.
 - (b) Discuss Committee review responsibilities regarding the Initial Test Program.
 - (c) A description of the provisions for maintaining Committee meeting minutes.
- 630.20 In regard to the description of the Nuclear Safety Audit and Review Committee in Section 13.4.2 provide:
- (a) A description of the committee's charter.
 - (b) Resumes or other qualification details of its members.
 - (c) A description how the qualifications of the members meet the requirements of Section 4.7 of ANS 3.1-1978.
- 630.21 Your discussions in Chapter 13, did not address the facility's Independent Safety Engineering Group. Please provide your plans to establish the Independent Safety Engineering Group in accordance with the guidelines furnished in Item I.B.1.2 of NUREG-0660 and NUREG-0737.

Questions For FSAR Section 13.5.1

- 630.22 With reference to the discussions of Administrative Procedures presented in Section 13.5.1:
- (a) FSAR Section 1.8 references Revision 3 of Regulatory Guide 1.33 while FSAR Section 13.5.1 references Revision 2 of this Regulatory Guide. Resolve this Discrepancy.
 - (b) Describe how the Administrative Procedures will comply with the requirements of ANSI N18.7-1976.
 - (c) Identify the persons (by position) responsible for the development, implementation and control of the Administrative Procedures.

- (d) Describe the Administrative Procedures governing the Initial Test Program. Your discussions should include details of the procedures that control:
- i. The development of individual test procedures.
 - ii. The conduct of the various phases of the test program.
 - iii. The review, evaluation and approval of test results, and
 - iv. The selection of individual to perform the tests.
- (e) Describe the Administrative Procedures implemented to:
- i. Substantially relieve the Shift Supervisor of routine administrative duties.
 - ii. Establish the overtime policy for members of the plant staff.
 - iii. Establish the organizational lines of succession; and provide for the delegation of the Station Manager's authority including his authority to issue Special and Standing Orders.