

Omaha Public Power District

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402/636-2000

July 15, 1993
LIC-93-0176

U. S. Nuclear Regulatory Commission
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Mail Station P1-137
Washington, DC 20555

- References:
1. Docket No. 50-285
 2. Letter from OPPD (W. G. Gates) to NRC (Document Control Desk) dated February 12, 1993 (LIC-93-006)
 3. Letter from NRC (S. D. Bloom) to OPPD (T. L. Patterson) dated April 22, 1993

Gentlemen:

SUBJECT: Respiratory Protection Requalification Training Frequency

In Reference 2, Omaha Public Power District (OPPD) requested a one-time schedular exemption from Fitness-For-Duty refresher training requirements. This was in conjunction with a one-time change in the General Employee Requalification Training (GERT) schedule at Fort Calhoun Station (FCS) to support implementation of the new requirements of 10 CFR Part 20 on July 1, 1993. The exemption was granted by the NRC in Reference 3.

In the process of implementing the revised GERT schedule, OPPD has determined that a one-time deviation from an industry standard associated with respiratory protection requalification training is prudent. As part of the upgrade to the FCS Radiation Protection program in 1988-90, OPPD implemented an improved respiratory protection program in accordance with NRC and industry standards. These standards include NRC Regulatory Guide 8.15 - *Acceptable Programs for Respiratory Protection*, NUREG-0041 - *Manual of Respiratory Protection Against Airborne Radioactive Materials*, and ANSI Standard Z88.2 - *American National Standard for Respiratory Protection*. ANSI Standard Z88.2 specifies respiratory protection requalification training occur at least once per 12 months.

Respiratory protection requalification training at FCS, as with the Fitness-For-Duty refresher training, is provided as part of the GERT. Because of the one-time GERT schedule change explained in Reference 2, some individuals will not receive respiratory protection requalification training at the annual frequency specified in ANSI Z88.2. OPPD is therefore implementing a one-time deviation from this aspect of ANSI Z88.2 for approximately 51 persons. This deviation will allow OPPD to continue providing respiratory protection requalification training as part of GERT, instead of scheduling separate training sessions exclusively for respiratory protection requalification. This will ensure a consistent and organized transfer of training information. Affected FCS personnel have previously received respiratory protection requalification training under the upgraded program. OPPD is confident that no adverse impact will result from the training schedule change.

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The one-time deviation described above has been discussed with S. D. Bloom, NRC Project Manager, and R. P. Mullikin, NRC Senior Resident Inspector for FCS. Please contact me if you have any questions.

Sincerely,

W. G. Gates

W. G. Gates
Vice President

WGG/tcm

c: LeBoeuf, Lamb, Leiby & MacRae
J. L. Milhoan, NRC Regional Administrator, Region IV
R. P. Mullikin, NRC Senior Resident Inspector
S. D. Bloom, NRC Project Manager