

Maine Yankee

RELIABLE ELECTRICITY FOR MAINE SINCE 1972

EDISON DRIVE • AUGUSTA, MAINE 04330 • (207) 622-4868

November 6, 1990
MN-90-111

SEN-90-308

UNITED STATES NUCLEAR REGULATORY COMMISSION
Attention: Document Control Desk
Washington, DC 20055

- References:
- (a) License No. DPR-36 (Docket No. 50-309)
 - (b) USNRC Letter to MYAPCo dated March 19, 1987 - Generic Letter 87-07
 - (c) MYAPCo Letter to USNRC dated June 26, 1987 (MN-87-78)
 - (d) USNRC Letter to MYAPCo dated March 29, 1989
 - (e) USNRC Letter to MYAPCo dated May 8, 1990 - Requalification Program Evaluation Report No. 90-01
 - (f) MYAPCo Letter to USNRC dated June 8, 1990 (MN-90-57)
 - (g) USNRC Letter to MYAPCo dated October 5, 1990

Subject: Requalification Program Evaluation - Modified Notice of Violation

Gentlemen:

With Reference (g) the NRC staff issued a revised notice of violation regarding Maine Yankee's licensed operator requalification program. A similar notice of violation, Reference (e), has been withdrawn. This letter addresses the revised violation and clarifies portions of the notice that appear to be in error.

NRC Notice of Violation:

10 CFR 50, Domestic Licensing of Production and Utilization Facilities, paragraph 50.54, "Condition of Licenses," subparagraph 50.54(i) states, in part:

"The licensee may not permit the manipulation of the controls of any facility by anyone who is not a licensed operator or senior operator as provided in Part 55 of this chapter."

10 CFR 55, Operators' Licenses, paragraph 55.59, "Requalification," subparagraph 55.59(a)(2) states that each licensee shall:

"Pass a comprehensive requalification written examination and an annual operating test."

SEN90308.LTR

9011130194 901106
PDR ADOCK 05000309
PDC

M003
11

4r Encl
Add: NRR Shankman, S

Maine Yankee

UNITED STATES NUCLEAR REGULATORY COMMISSION
Attention: Document Control Desk

MN-90-111
Page Two

Contrary to the above, as of March 15, 1990, the licensee's Licensed Operator Recertification Course, Revision 11, allowed for licensed personnel to be exempted from the applicable Knowledge Evaluation Requirements (examinations) and one of the licensed training instructors had not taken the required annual operating test.

Maine Yankee Response:

As described in Reference (f), Maine Yankee's Requalification Program was developed pursuant to 10 CFR 55.59(c) and Generic letter No. 87-07. The portion of the program that permitted certain licensed training personnel be exempt from written examinations was based on ANSI/ANS-3.1 guidance which was endorsed by NRC Regulatory Guide 1.8 (1985). We understand through discussions with the NRC Regional staff that although Maine Yankee's program conforms to the stated guidelines, it does not conform with all portions of 10 CFR, Part 55, and, therefore, those non-conforming portions of the program must be eliminated. As described below, Maine Yankee has modified the Requalification Program to resolve this matter.

One portion of the notice of violation requires clarification. Specifically, the staff indicated that ... "one of the licensed training instructors had not taken the required annual test." All of Maine Yankee's licensed operators and training instructors completed an annual operating test prior to March 15, 1990. At the time of the inspection, one licensed instructor had not completed a biennial written examination; however, subsequent to the inspection this individual completed and passed the written examination. This written examination was completed prior to the expiration of Maine Yankee's requalification cycle (prior to June 30, 1990) which conforms with our requalification course description. Further, although exemptions were permitted in past years, no licensed operators were exempted from either the annual operating test or the biennial comprehensive written examination in 1990.

Immediate Corrective Actions:

None

Corrective Actions to Prevent Recurrence:

Maine Yankee's Operator Requalification Program has been revised to eliminate provisions allowing licensed training instructors to be exempted from operating tests and/or comprehensive written examinations. A copy of the revised portion of the Program is attached for your information.

Maine Yankee

UNITED STATES NUCLEAR REGULATORY COMMISSION
Attention: Document Control Desk

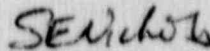
MN-90-111
Page Three

Date at Which Full Compliance was Achieved:

Compliance was achieved on November 15, 1990 with the revision of the program described above.

We trust this information is satisfactory. Please contact us should you have any comments on this matter.

Very truly yours,



S. E. Nichols
Licensing Section Head

SEN:SJJ

Attachment

c: Mr. Charles S. Marschall
Mr. E. H. Trottier
Mr. Thomas T. Martin

ATTACHMENT

COURSE ADMINISTRATION:

Scheduling:

Each Licensed Operator Recertification Course will be scheduled biennially. Courses will commence on July 1st of each even numbered year and will be complete by June 30th of the following even numbered year.¹⁰

Course content selection is conducted by referring to the Course Content Attachment and selecting those lessons indicated for the appropriate year completion date. When a refueling outage is scheduled during the training cycle, Module 13 (Refueling) lessons will be scheduled in the instructional block prior to the outage.

The resultant list of lessons will be appended/modified by results of examination reviews, Operations Department feedback, industry events/concerns and issues important to plant operations. The Operations Training Section Head will approve each developed Licensed Operator Recertification Course schedule.

[Exemption²²:

Licensed operators enrolled in the Senior Reactor Operator Certification Course are exempt from the requirements of this course.

The Operations Training Section Head may exempt a licensed operator from the end of course comprehensive written or operating examination requirements during any year in which the operator successfully completes a NRC administered or sanctioned license operator qualification or requalification examination.

The Operations Training Section Head may exempt up to two (2) licensed members of the training staff (per instructional block) from end of Instructional Block Examinations which they develop or approve.²⁰

[The Operations Training Section Head may exempt training staff personnel from participation in scheduled training if they will have received equivalent training either from their instructor or simulator support duties during the course duration. Training staff personnel may not be exempted from course evaluation requirements, except as indicated above. The Operations Training Section Head is responsible for documenting all exemptions and their basis.¹²

The Operations Training Section Head may exempt trainees from performing those Knowledge Evaluation Requirements and Performance Requirements scheduled prior to their enrollment in a course already in progress.¹⁰