

**Florida  
Power**  
CORPORATION

October 15, 1982  
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OP-2-40

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Crystal River Unit 3  
Docket No. 50-302  
Operating License No. DPR-72  
NUREG-0737, Item I.A.1.1  
Shift Technical Advisor

- Reference:
1. Florida Power Corporation letter,  
Baynard to Eisenhut; January 30, 1982
  2. U.S. NRC memo Denton to Dircks,  
"Integrated Plan for the Development  
of a Rule for Shift Crew Qualifications"

Dear Mr. Eisenhut:

In accordance with Florida Power Corporation's (FPC's) commitment on Shift Technical Advisors (STA's), as stated in Reference 1, we have recently licensed all of our STA's at the Senior Reactor Operator (SRO) level.

FPC intends, for the foreseeable future, to continue with our present STA concept, i.e., employ individuals, for the STA position, who possess Bachelor of Science degrees with significant nuclear power experience, trained at the SRO level and subsequently license them at that level. These individuals are and will be utilized in a 24-hour on-site shift rotation scheme.

FPC is therefore now following the STA qualification guidance contained in Reference 2, applicable portion attached (Attachment 1). We believe this guidance will accomplish the goal of providing engineering expertise to the Shift Supervisors during normal and off-normal operating conditions.

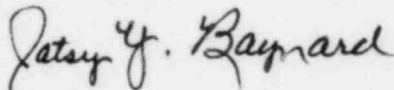
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Our current class of STA candidates, all holding Bachelor of Science degrees with a minimum of five years nuclear experience, is expected to complete our SRO training program in December 1982. They will then complete their training with accident and transient response and evaluation followed by two weeks on duty with a qualified STA. This current STA training program exceeds prevailing industry practice and meets the guidance in Reference 2.

Very truly yours,



Dr. P.Y. Baynard  
Assistant to Vice President  
Nuclear Operations

WMJ/myf

Attachment

Attachment 1  
Applicable Portion of Reference 2

Policy Guidance

Licensees of operating plants and applicants for operating licenses shall establish policies which will provide engineering expertise on-shift whenever a PWR is being operated in Modes 1-4 or a BWR is operated in Modes 1-3. Only one individual with such expertise is necessary at a multi-unit site if the individual is qualified and certified on all units.

The objective of this policy is to assure that at least one individual, on-shift, is available to provide engineering advice to the Shift Supervisor or the operating crew. Further, the individual shall be assigned to shift duties to enhance abilities to diagnose failures and provide information for short-term decision making.

The following guidelines shall be adhered to regarding the qualifications of individuals assigned to the position:

1. Baccalaureate or equivalent degree (e.g. professional engineer certificate) in engineering or physical sciences with engineering experience, and
2. Two years of engineering experience related to nuclear power production, and
3. Certified by the utility as having successfully completed a Senior Operator training program for the particular plant, and
4. Specific training in the response and analysis of plant transients and accidents, plant design and layout, and capabilities of instrumentation and controls in the control room, i.e., current STA training as delineated in NUREG-0737.

An individual with these qualifications shall be assigned to each shift when the plant is operating in the designated Modes. The individual may, if licensed at the Senior Operator level, be a member of the normal operating crew, working at licensed duties, or may be a separate member of the crew reporting to the Shift Supervisor and performing assigned engineering duties consistent with supporting safe plant operation, including the review and evaluation of operating experience.

The intent of this policy guidance can be met by an approved STA program. However, it is now anticipated that the eventual regulation will require that a degreed and senior operator certified individual be assigned to each shift. (As the concept of a shift engineer, with the qualifications identified above, is adopted by licensees, the staff will review, on a timely basis, each submittal to ensure conformance).