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March 24, 1983
5211-83-073

Mr. John F. Stolz, Chief
Operating Reactors Branch No. 4
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Changes to Licensed Operator Requalification Program

Your letter of March 3, 1983, stated that one facet of our proposed change to our licensed requalification program, as presented in our letter 5211-82-273, dated December 2, 1982, is unacceptable. Furthermore, your letter noted that examinations were administered on December 8, 9 and 10, 1982, and inferred from our proposed change that since the examinations did not contain applicable portions of Title 10, a deficiency exists which must be corrected.

It was not our intent to reduce the scope of our training program, nor did we. In section 4.2.1.1 (Attachment I) of our requalification program submitted to the Operator Licensing Branch on November 5, 1981, the topic of Applicable Portions of Title 10, Chapter 1, Code of Federal Regulations is listed as one of the topics of the Fundamentals Review Lecture Series, and therefore, remains a part of the requalification program. This meets the requirements of 10 CFR 55 Appendix A, Item 2, 'Lectures', which lists the subject as one which is to be presented on a regular and continuing basis throughout the license period. Our practices are similar to the requalification programs mentioned in your letter, which integrate parts of Title 10, Chapter 1, into applicable sections of other licensees' programs (e.g. radiation protection, and applicable administrative, operating, and emergency procedures). This results in related questions from Title 10, Chapter 1, appearing in several sections of our annual requalification examination. We also have a specific presentation on Title 10, Chapter 1, scheduled as part of our two year license period program. The presentation is currently scheduled for this fall. The change we proposed in our letter was done only in an attempt to reduce specific categories and make our examination categories parallel those of the newly formatted license examinations.

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Your concern resulting from our letter is obvious and regrettable, in that we were not clear in specifying our basic intent. In order to avoid further confusion, we propose to change the wording of Section 4.5.1.1 to read as follows:

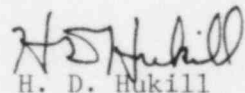
"4.5.1.1 Written Examination Content

The written examination shall contain examination questions covering topics addressed in the Fundamentals Review Lecture Series (4.2.1.1) and the Operational Proficiency Lecture Series (4.2.2.1).

The topics shall be grouped into five (5) examination categories for each license level (RO and SRO). The examination shall be structured so that the level of questioning is consistent with the individual's license level (RO or SRO) and current format of NRC licensing examinations."

Based on the above, we do not feel that our requalification program or our annual requalification examinations were deficient in any way. The examinations given in December 1982, were in complete compliance with 10 CFR 55 Appendix A, Item 4, 'Evaluation', and therefore, no further action is considered necessary.

Sincerely,



H. D. Hukill
Director, TMI-1

HDH:JGB:vjf

- 3) Establish a system for evaluating and documenting licensed personnel proficiency and competency.

4.2 PRE-PLANNED LECTURE SERIES

The operator requalification program shall include pre-planned training sessions conducted on a regular and continuing basis. The training sessions shall include two types of lecture series as follows:

- 1) Fundamentals Review Lecture Series
- 2) Operational Proficiency Lecture Series

4.2.1 Fundamentals Review Lecture Series

The Fundamentals Review training sessions cover areas in which the knowledge required of a licensed individual is relatively constant.

4.2.1.1 Lecture Series Topics

The Fundamentals Review lecture topics are selected on an as-needed basis and shall include the following:

- 1) Theory and Principles of Reactor Operation.

- 2) Heat Transfer, Fluid Flow and Thermodynamics.
- 3) Features of Facility Design including Plant Systems.
- 4) General and Specific Plant Operating Characteristics including Expected Response to Equipment Failure.
- 5) Plant Instrumentation and Control Systems.
- 6) Plant Protection Systems.
- 7) Engineered Safety Systems.
- 8) Radiation Control and Safety and Plant Chemistry.
- 9) Applicable Portions of Title 10, Chapter I, Code of Federal Regulations.
- 10) Fuel Handling and Core Parameters

4.2.1.2 Lecture Series Topic Selection

The topics presented in the Fundamentals Review series should reflect the general results of the annual examinations and performance of the licensed personnel as evaluated by the Manager of Operations and the Operations and Maintenance Director.