



LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION

P.O. BOX 618, NORTH COUNTRY ROAD • WADING RIVER, N.Y. 11792

JOHN D. LEONARD, JR.
VICE PRESIDENT - NUCLEAR OPERATIONS

July 31, 1984

SNRC-1062

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Licensed Operator Requalification Program
Shoreham Nuclear Power Station - Unit 1
Docket No. 50-322

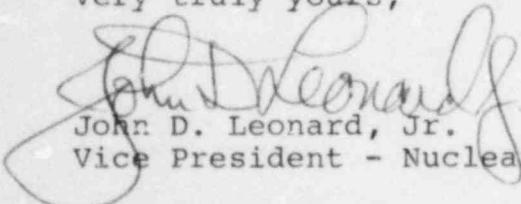
- References:
1. Letter from LILCO to NRC (SNRC-942) dated August 12, 1983
 2. Letter from NRC (A. Schwencer) to LILCO (M. Pollock) dated March 14, 1984

Dear Mr. Denton:

Enclosed please find our response to the NRC comments regarding Shoreham's Licensed Operator Requalification Program.

If you have any questions or require additional information, please do not hesitate to call this office.

Very truly yours,


John D. Leonard, Jr.
Vice President - Nuclear Operations

NRL:ck

Enclosure

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LILCO'S RESPONSE
TO NRC COMMENTS REGARDING
SHOREHAM'S LICENSED OPERATOR REQUALIFICATION PROGRAM

Responses to Specific Comments

Comment 1: Section 8.1.4 - Waiver of specific classroom lectures may be granted if the individual receives a passing grade of 80% in the annual examination. (Section 2, Appendix A of 10 CFR Part 55, Section 5.2.1.7 of ANS 3.10-1981)

Response: Procedure will be modified to reflect the fact that waivers will only be granted for areas in which an individual received a grade of greater or equal to 80% on his annual exam.

Comment 2: Section 8.2.1 - Lectures must include all subjects contained in Section 2 of Appendix A of 10 CFR Part 55. Lectures in heat transfer, fluid flow, thermodynamics and mitigating of accidents involving a degraded core must also be included in your program. (H. R. Denton letter of March 28, 1980)

Response: Procedure will be modified to align with 10 CFR Part 55 Appendix A terminology. The addition of heat transfer, fluid flow, thermodynamics and mitigation of core damage training had been added prior to the receipt of the NRC comments. It should further be noted that lectures on heat transfer and selected portions of the mitigation of core damage training were administered during the course of our 1983 requalification program.

Comment 3: Section 8.3.1 - Control manipulation should reference Appendix 12.2. In addition, control manipulations must be evaluated. (Item C3, Enclosure 1 of the H. R. Denton letter of March 28, 1980).

Response: Section 8.3.1 will be modified to reference Appendix 12.2. In addition control manipulation evaluations for all Appendix 12.2 items will be completed on a biennial basis.

Comment 4: Section 8.3.2.1 - We believe that this should read "All licensed personnel shall be kept cognizant of SNPS design, procedural and facility license changes using one or more of the following methods."

Response: Procedure will be modified to incorporate this word change.

- Comment 5: Section 8.3.2.3 - We recognize that plant drills can provide valuable training. We recommend that drill scenarios also include objectives. We also request that "evaluators" periodically participate in the drill program.
- Response: Drill scenarios will be modified to include the drill objective(s) prior to their use in the requalification program. In addition, all SNPS licensed evaluators also are evaluated via drills as part of the requalification program.
- Comment 6: Section 8.3.2.4 - The staff is preparing a regulatory guide which will address backup operators. Therefore, backup operators are subject to future changes in your program.
- Response: The regulatory guide will be reviewed for its impact on our backup license operators when it is issued.
- Comment 7: Section 8.4 - Please refer to Generic Letter 83-17 issued on April 18, 1983. It provides additional information on the conduct of requalification examinations.
- Response: Guidelines for the conduct of requalification exams are addressed in SP 12.014.07 Appendix 12.4, "Administration of Requalification Exams".
- Comment 8: Section 8.4.1 - We recommend a separate section provide information on evaluations of actual performance and one-on-one walk-through examinations. In addition, provisions for accelerated training must be provided if evaluations clearly indicate the need. (Section 4, Appendix A of 10 CFR Part 55.)
- Response: Actual performance is evaluated on an annual basis, as a minimum, for all on shift licensed personnel. These performance evaluations are reviewed by the Operations Section and training needs are identified. In general these needs will be used to identify topics to be presented in the requalification program. However, accelerated retraining for an individual license holder can also be identified. Back-up licensed holders will be evaluated during their reactivity manipulations by a member of the training section.
- Comment 9: Section 8.4.5 - The program should contain limits on the number of exemptions. Partial exemptions should also be considered.

Response: Licensed individuals who are directly involved with the preparation and grading of examinations are required to take one full written and one full oral examination in a 2 year period. This may be accomplished by a waiver of a full exam for one year or, by partial waivers in each year for identified sections. Waivers should not be allowed for any one exam section in consecutive years.

Comment 10: Section 11 - We recommend you add the following additional references:

Title 10 CFR Part 50 - Section 50.54, Conditions of Licenses.

Appendix A of 10 CFR Part 55

NUREG-1021, Operator Licensing Examiner Standards

Regulatory Guide 1.8 - Personnel Selection and Training

Regulatory Guide 1.149 - Nuclear Power Plant Simulators for use in Operator Training.

Response: Additional references will be added.

Responses to General Comments

Comment 1: Does this program apply to instructors? If so, please include the degree of participation in the program? (H. R. Denton letter of March 28, 1980.)

Response: Instructors licensed on the Shoreham facility fully participate in all areas of the requalification program.

Comment 2: Does the Limerick simulator meet the guidelines contained in Regulatory Guide 1.149 - Nuclear Power Plant Simulators?

Response: The Limerick Simulator meets the guidelines of Regulatory Guide 1.149.

Comment 3: We recommend you resubmit the program with modifications developed as a result of our comments. You may omit the Requalification Training Program and Schedule when the program is submitted.

Response: LILCO will resubmit the program with modifications developed as a result of your comments by mid-August.