

DMB

AUG 20 1984

Docket No. 50-263  
Docket No. 50-282  
Docket No. 50-306

Northern States Power Co.  
ATTN: Mr. C. E. Larson  
Director of Nuclear  
Generation  
414 Nicollet Mall  
Minneapolis, MN 55401

Gentlemen:

We have reviewed the letter of July 5, 1984 (W. R. Waldron to T. Lang), which was intended to clarify your interpretation of the "on shift training" requirements. This requirement which was contained in a letter dated March 28, 1980, from H. R. Denton to All Power Reactor Applicants and Licensees states:

" Training

- a. Senior operators: applicants shall have 3 months of shift training as an extra man on shift.
- b. Control Room operator: applicants shall have 3 months training on shift as an extra person in the control room."

The clarification in NUREG-0737, Item I.A.2.1, states, in part, for non-degreed individuals: "participation in an SRO training program that includes 3 months on-shift as an extra person;" and for degreed individuals: "3 months on shift as an extra person in training for an SRO position." The purpose is explained as "Holding these positions assures that individuals who will direct licensed activities of licensed operators have had the necessary combination of education, training and actual operating experience prior to assuming a supervisory role at the facility." Additionally, NUREG-0094, Appendix F, "Eligibility for Examination With No Reactor Startup Demonstration," states: "at least three months of this time shall include participation in on-the-job training which involves manipulation of the nuclear plant controls during day-to-day operation. This phase of the training will be programmed and supervised."

It is clear that the three months on shift is intended to be a training function to prepare the candidate for the job to be performed. Based on the above the following criteria are used to evaluate licensee on-shift licensing programs:

- 1) The objectives of the training are established in writing.

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- 2) The candidate should be in a training status and supervised by training department personnel or designated operations personnel.
- 3) The training should be structured and scheduled in advance to the extent possible (i.e., the program can be broken into segments to provide simulator training or classroom training on evolutions conducted or to be conducted during observation training).
- 4) If the training is not continuous the three months equates to 65-eight hour shifts. The four hour time period is considered a minimum on-shift for meaningful experience.

A review of your submittal using the above stated criteria leads us to believe that parts of your program are not satisfactory and should be revised. In particular, in the License Training Program and the RO/SRO Upgrade Program it is not clear how those persons in the program are being supervised while on shift. In addition, the procedure that you describe for those persons who are working towards an SRO license through their own initiative and are not released entirely from shift duties, clearly does not meet the intent of the requirements and should be revised.

Please be advised that you will be required to provide documentation that the next group of SRO upgrade candidates have satisfactory complied with the requirements stated above.

If you have questions concerning this matter contact J. I. McMillen.

Sincerely,

Original Signed by R.D.Walker

R. D. Walker, Chief  
Operations Branch

cc w/enc: B. Boger, NRR

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Burdick/sf  
08/13/84

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McMillen  
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Walker  
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