

50-305

SEP 7 1984

MEMORANDUM FOR: Darrell G. Eisenhut, Director, Division of Licensing
FROM: R. Lee Spessard, Director, Division of Reactor Safety
SUBJECT: REQUEST FOR ASSISTANCE - ON SHIFT TRAINING PROGRAM FOR OPERATORS AND SENIOR OPERATORS

It has recently come to our attention that personnel at the Kewaunee Nuclear Power Plant operated by Wisconsin Public Service Corporation may not be satisfying the intent of the requirements contained in the March 28, 1980, letter from H. R. Denton to All Power Reactor Applicants and Licensees.

The licensee submitted a letter to H. R. Denton, dated September 29, 1982, containing their interpretation of these requirements for the SRO upgrade candidates. It is important to note the last paragraph on the second page of this letter (Enclosure 2). Kewaunee personnel have stated that this means that any time a candidate spends onsite can be counted toward his time on shift to satisfy the three month requirement. We do not believe this complies with the intent of the requirements. The licensee states that they never received an answer to this letter.

We have notified the licensee that we will not administer the next examination to Kewaunee personnel unless they provide us with proper documentation of the three month training program. As a result, they have postponed the exams from September to December.

This memo is requesting that Wisconsin Public Service Corporation be formally notified of the requirement to change their on-shift training program to comply with the policy stated in the Denton letter and NUREG-0737 and since the original letter was transmitted to NRR, we suggest that it is more appropriate for the response to come from headquarters. We have enclosed a proposed draft letter to the licensee to assist in this task (Enclosure 1). We believe this draft letter is within the guidelines for on-shift training contained in the May 25, 1984 memorandum from D. H. Beckham to R. D. Walker.

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Darrell G. Eisenhut

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If you have questions related to this matter, please contact J. I. McMillen of my staff.

"Original Signed by R. L. Spessard"

R. L. Spessard, Director
Division of Reactor Safety

Enclosures: As stated

cc: R. Wessman, NRR
H. L. Thompson, Jr., NRR
R. W. Starostecki, RI
J. A. Olshinski, RII
R. P. Denise, RIV
T. W. Bishop, RV

RIII
FR
Reidinger/sf
09/06/84

RIII
McMillen
McMillen
9/7/84

RIII
Walker
Walker
9/7

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Spessard
Spessard
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Wisconsin Public Service
Corporation

ATTN: Mr. C. W. Geisler

Vice President - Nuclear Power

Post Office Box 1200

Green Bay, WI 54305

Dear Sir:

Recent conversations with personnel of your organization have indicated to us that certain practices contained in your training program do not comply with the requirements contained in the letter dated March 28, 1980, from H. R. Denton to All Power Reactor Applicants and Licensees, which states:

Training

- a. Senior operator: applicants shall have three months of shift training as an extra man on shift.
- b. Control Room operator: applicants shall have three 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 a degreed individual:

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"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, "Elegibility 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 training programs:

1. The objectives of the training are established in writing.
2. The candidate should be in a training status and supervised by training department personnel or designated operations personnel.

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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, then the three months equates to 65-8 hour shifts.

A review of your interpretation of these requirements contained in a letter dated September 29, 1982, to H. R. Denton from C. W. Geisler and further conversations with training personnel indicates to us that your program does not satisfy the above requirements. Specifically, your program for providing Senior Operator applicants with three months of shift training as an extra man on shift is deficient in that you appear to be taking credit for time onsite by the applicant which is not spent in an on-shift training program as described above. Please submit the latest training program along with any clarification you believe necessary so that this problem can be resolved.

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If you have additional questions concerning this matter, please contact

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Sincerely,

WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305

TMI file

TMI correspondence

September 29, 1982

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
NUREG 0737 Item I.A.2.1. - SRO Qualifications

In a concerted effort to comply with all the current requirements for Senior Reactor Operator (SRO) Upgrade Training, the Kewaunee Nuclear Power Plant Training Department has modified the scope and intent of its training programs. The purpose of this letter is to describe the program we have implemented to comply with Item I.A.2.1 of NUREG 0737; specifically, the requirement that applicants for an SRO license have 3 months on shift as an extra person. Secondly, we would like to reiterate our proposed schedule to provide a second SRO on each shift.

Historically, if an individual with a reactor operators (RO) license was to be upgraded to a shift supervisor (SRO), in addition to passing all the NRC exams, he was also required, although informally at the Kewaunee Plant, to spend two to four weeks on-shift as an extra individual to the normal shift supervisor to become familiar with the duties and responsibilities of the shift supervisor. He then would be the shift supervisor on his own accord.

The NUREG 0737 requirement that SRO upgrade candidates spend a total of three months (500 hours) in the plant as an extra individual to the normal shift operating crew, has resulted in revisions to our training program. Once an SRO candidate is relieved from shift duties he enters the new SRO upgrade program format. This format essentially consists of a guided study program with no other concurrent duties or responsibilities. During this period, the candidate(s) is (are) in the plant fulfilling the

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From

Mr. H. R. Denton
September 29, 1982
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NUREG 0737 requirement of three months (500 hours) as an extra individual to the normal shift supervisor. Their time will be spent performing any of the following functions:

1. Guided On-Shift Study (normally day shift) as the shift supervisor in training. In this position the candidate will perform the normal duties of the shift supervisor under the cognizance of the licensed (SRO) Shift Supervisor. If there is more than one candidate, they will normally rotate in this position on a daily basis.
2. In-plant system tracing.
3. Classroom training covering: reactor theory, heat transfer and thermodynamics, administrative and emergency procedures, design features, etc.

An instructor is normally available to conduct training, answer questions, and conduct oral or written examinations to determine program and individual progress. This individual oversees the entire SRO upgrade process. An SRO upgrade checkout sheet is monitored and completed during this training period.

As part of the SRO upgrade program, a simulator training program will be conducted on a non-plant specific simulator. The NRC has recently eliminated the requirement to conduct simulator exams for plants not having plant specific simulators; however, since this training provides valuable insight into plant and systems interrelationships and transient behavior, we intend to continue this training. These simulator sessions typically encompass 30 hours of actual simulator time.

When the plant training staff feels that the candidate is prepared for the exam process, the SRO candidate is scheduled for his NRC licensing exams. Once the examination process is completed, the candidate is free to return to shift duties as a reactor operator to possibly relieve another SRO candidate who can subsequently enter the SRO upgrade program. Please note that during the three-month training period the SRO candidates will comply with 10CFR55 requirements for maintaining their reactor operators license.

It is important to note the interpretation we have taken in meeting this NUREG requirement. The NUREG requirement states that:

- a.) Senior applicants: Applicants shall have 3 months of shift training as an extra man on shift.

We feel our training program as described above meets the intent of this statement. Our program is flexible in that, an SRO candidate can spend a portion of his time outside the control room, yet still within the plant. This flexibility allows the candidate to become familiar with the additional duties and responsibilities through guided self-study classes, and still

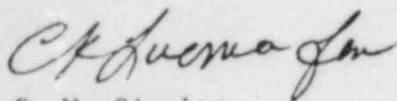
Mr. H. R. Denton
September 29, 1982
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maintain involvement in plant operations. The guided self-study classes are held within minutes of the control room so that no interference with plant operations takes place and if any interesting occurrence should take place the candidate(s) can be in the control room almost immediately.

This letter has summarized the basic format of the revised SRO upgrade program to comply with current requirements. Please note again that the process is time consuming by its nature. The program and schedule have to be flexible enough to accommodate any vacancies such as candidate withdrawal for academic or physical reasons. The result is that all potential SRO candidates cannot be examined until the middle of 1983 (May/June period). For that reason, we are committing to a January 1984 date, although if all goes well we would be done by July, 1983.

We hope this letter will be informative as to our progress toward obtaining additional licensed operators at the Kewaunee Nuclear Plant. We feel the SRO Upgrade Program as revised complies with the intent of your requirements.

Sincerely,



C. W. Giesler
Vice President - Nuclear Power

smv

cc - Mr. Robert Nelson, NRC Sr Resident Inspector
RR #1, Box 999, Kewaunee, WI 54216