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Writer's Direct Dial Number:

September 10, 1984

Dr. Thomas E. Murley, Administrator
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Dear Dr. Murley:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Operator Training During Cycle 10 Refueling Outage

GPUN is confident that the measures taken to ensure proper training and experience distribution among on-shift operations personnel have more than adequately prepared us for the restart of Oyster Creek. In addition, we believe that the level, variety and complexity of operations conducted during this outage have enabled GPUN licensed operators to maintain their licensed skills.

It is our purpose in this letter to confirm that we have addressed and satisfied your concerns relative to operator training and maintenance of operational skills. Our recent meeting with your staff on September 5, 1984 communicated the details of our on-going plans and programs to you, with which you are in general agreement.

Summarized below are the plans and programs in place or to be implemented in the areas of maintaining licensed operator skills, familiarizing operators with plant modifications, and on-going training programs during the outage that incorporate the above items.

Operator Training/Requalification

- a) Annual Evaluation Examinations consisting of written and oral portions are administered. The oral portions involved the use of the full-scale control room photographic mockup in accordance with our approved Requalification Program.
- b) A pre-planned lecture series utilizing annual examination results addresses systems, reactor fundamentals, procedures, technical specifications, modifications, licensee event reports, bulletins, notices and other pertinent information.

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c) Skills Training incorporating reactivity manipulations, participation in various plant evolutions, and control manipulation walk-throughs using the control room mockup.

d) The Simulator training element for shift licensed personnel has been increased in length from three to six days during the outage and emphasizes startups, shutdowns, heatups, cooldowns, and other evolutions. Procedure training has been implemented and involves symptom-based emergency operating procedures, abnormal event operating procedures and others. The procedures were actually used during the simulator training sessions in June and July, 1984.

e) A Plant Modification Training Program is in effect and has become a major part of requalification training. We have performed extensive evaluations of modification training results including written and oral examinations and walk-throughs on the mockup. In addition, a separate retraining package covering all outage modifications has been administered. Operators have also been further familiarized with modifications through their direct involvement in startup testing.

f) Other areas of training include:

1. Technical specification changes as they relate to modifications;
2. BWR core thermal hydraulics and thermal limits;
3. Extensive upgrading of equipment operator skills and knowledge, with emphasis on safety systems;
4. Incorporation of "systems important to a safe and efficient restart" in recent requalification cycles.

g) GPUN plant management has successfully developed, for startup, a five-shift operations organization with an excellent nuclear operations experience mixture. All shifts will possess two senior reactor operators. In addition, the experience levels for each shift are far in excess of the Near-Term Operating License Working Group's recommendations. Our average operating shift experience levels are as follows:

Total power plant	44.4 years
Total nuclear power plant	40.8 years
Total Oyster Creek	33.8 years

This experience level is well distributed among the five shifts.

h) We believe strongly that GPUN has maintained its licensed operator skills during the outage through a wide variety of evolutions and operations. Technical Specifications and License requirements have been in effect during the outage and have necessitated full-time involvement on the part of licensed operators. Additionally, procedure requirements for the conduct of operations and equipment control have been strictly adhered to. Our presentation to you on September 5, 1984 described systems operated, started up and shutdown during the outage, special evolutions, surveillances, and startup tests of modifications with which licensed operators have been deeply involved.

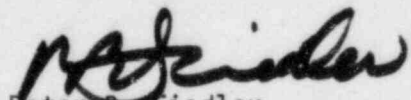
i) The plant startup schedule will include training elements and evolutions to recondition our personnel to an operating plant. Scheduling of important evolutions will occur as close as possible to shift turnover so that at least two crews will be able to conduct/witness them. This startup plan was presented to you in detail.

j) An assessment of the need for a planned reactor trip from power will be made and implemented as necessary. For the purpose of testing the new scram dump volume modifications two scrams during the startup sequence are planned.

k) All shift operating personnel will be briefed on "last minute" changes to modifications and significant procedure changes, prior to startup.

In the event that any comments or questions arise in this matter, please contact Mr. Drew G. Holland of my staff at (609)971-4643.

Very truly yours,



Peter B. Fiedler
Vice President and Director
Oyster Creek

PBF/DH/dam

cc: NRC Resident Inspector
Oyster Creek Nuclear Generating Station
Forked River, NJ 08731