

MAR 5 1985

Docket No.: 50-440

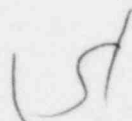
Mr. Murray R. Edelman, Vice President  
Nuclear Operations Group  
The Cleveland Electric Illuminating Company  
P. O. Box 5000  
Cleveland, Ohio 44101

Dear Mr. Edelman:

Subject: NRC Staff Findings Relative to Operating Shift Experience for  
the Licensing of Perry Nuclear Power Plant, Unit 1

Enclosed are the NRC staff's evaluation findings based on its review of the operating experience information provided by your letters dated March 9, 1984, January 14, 1985 and February 6, 1985, which we propose to incorporate in the next Perry SER supplement. The staff concludes that Perry Unit 1 will have two shift supervisors and four shift technical advisers with sufficient hot participation experience to safely operate Unit 1 at time of licensing. This matter is accordingly considered closed pending confirmation by the NRC regional staff that the six individuals in question have acquired senior operator licenses before Unit 1 fuel load. Such confirmation will be a condition for issuing an operating license for Perry, Unit 1.

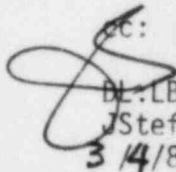
Sincerely,



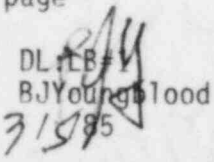
B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing

Enclosure: As stated

cc: See next page



DL:LB#1  
JStefano:es  
3/14/85



DL:LB#1  
BJYoungblood  
3/15/85

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Docket File  
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

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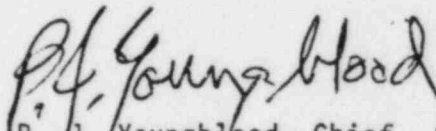
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B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing

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PFPPY

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## PERRY SSER INPUT

## 13 CONDUCT OF OPERATIONS

## 13.1 Organizational Structure of Applicant

13.1.2 OPERATING ORGANIZATION13.1.2.3 Operating Shift Crews

In Section 13.1.2.3 of NUREG-0887, it was noted that, although the Perry operating staff had received extensive experience from the U.S. Naval Nuclear Program and would gain additional experience from the actual construction and testing of the Perry plant itself, they had little experience operating a large commercial Boiling Water Reactor (BWR). The staff's position was that each operating shift should be assigned a person who has had commercial BWR operating experience. The assignments should last for a period of one year from fuel load or until the attainment of a nominal 100% power level, whichever occurs later.

Subsequent to the May 1982 publication of NUREG-0887, dialogue with the industry was begun (in late 1983) to find a way of ensuring that each operating shift at a newly licensed plant had at least one senior operator with previous hot operating experience. On February 24, 1984, an Industry Working Group, representing utilities with nuclear power plants under construction or ready for operation, presented a proposal to the Commission on the amount of previous operating experience considered to be the minimum desirable on each shift and how that experience could be obtained. On June 14, 1984, the Commission accepted the industry proposal with certain clarifications. Information regarding the Commission action was forwarded to the industry as Generic Letter 84-16, dated June 27, 1984. The objective is that, at the time of fuel load, each operating shift shall have at least one senior operator with a minimum of six months of hot operating experience on a

same type plant, including start-up/shutdown experience and at least six weeks above 20% power.

Information from the applicant regarding the operating experience of license candidates was submitted by letters dated March 9, 1984; January 14, 1985; and February 6, 1985. The February 6 submittal lists 14 senior operator candidates for on-shift positions, two of whom clearly meet the hot operating experience guidelines of Generic Letter 84-16.

In addition to the two experienced Shift Supervisors, the applicant has four Shift Technical Advisors (STAs) who recently completed 11-month assignments at the Susquehanna Steam Electric Station as participants in the Unit 2 power ascension test program. These four STAs will be licensed as senior operators and assigned to shifts at Perry Unit 1. Generic Letter 84-16 allows SRO-licensed STAs to be used to satisfy hot participation experience requirements as long as they serve as members of operating shift crews.

The staff has reviewed the applicant's submittals and finds that there are six individuals with hot participation experience either as licensed operators at operating BWRs or as participants in a BWR power ascension program. Assuming these six individuals will be successfully licensed as senior operators at Perry Unit 1 prior to fuel load, the applicant meets the requirements of Generic Letter 84-16.

To ensure that Perry Unit 1 retains a sufficient number of experienced senior operators during the initial stages of operation, we will condition the operating license to require a licensed senior operator on each shift who has had at least six months of hot operating experience at a large commercial BWR, including at least six weeks at power levels greater than 20% of full power, and who has had BWR startup and shutdown experience. The license condition shall be effective for a period of one year from fuel load or until the attainment of a 100% power level, whichever occurs later. At that point most, if not all, licensed operators should have accumulated at least six months of hot operating experience, and the license condition can be deleted.

Enclosure

PROPOSED LICENSE CONDITION

Operating Staff Experience Requirements

At the time of fuel load the licensee shall have a licensed senior operator on each shift who has had at least six months of hot operating experience on a same type plant, including at least six weeks at power levels greater than 20% of full power, and who has had BWR startup and shutdown experience. This license condition shall be effective for a period of one year from fuel load or until the attainment of a nominal 100% power level, whichever occurs later.