

Public Service  
Electric and Gas  
Company

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Vice President - Nuclear Operations

JUL 08 1992

NLR-N92083

LCR 92-05

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Gentlemen:

LICENSE AMENDMENT APPLICATION  
CLARIFICATION OF REQUIREMENTS FOR LICENSED OPERATOR  
QUALIFICATIONS AND TRAINING  
HOPE CREEK GENERATING STATION  
FACILITY OPERATING LICENSE NPF-57  
DOCKET NO. 50-354

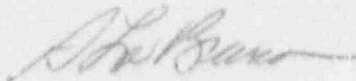
This letter constitutes an application for amendment to Appendix A of Facility Operating License NPF-57 for the Hope Creek Generating Station and is being filed in accordance with the provisions of 10CFR50.90. This amendment application proposes changes to Technical Specifications (TSs) 6.3, "Unit Staff Qualifications" and 6.4, "Training" to clarify the current requirements for licensed operator qualifications and training. Attachment 1 contains a detailed description of the proposed changes along with our 10CFR50.92 analysis of significant hazards. Marked up TS pages showing the proposed changes are included as Attachment 2.

Upon NRC approval, please issue a License Amendment which will be effective upon issuance and shall be implemented within 60 days of issuance. This latitude permits time to complete the actions necessary to implement the proposed changes.

Should you have any questions or comments on this transmittal, do not hesitate to contact me.

Sincerely,

Affidavit  
Attachments (2)



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JUL 08 1992

C Mr. T. T. Martin, Administrator - Region I  
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Mr. T. P. Johnson (S05)  
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Mr. K. Tosch, Chief  
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REF: NLP-N92083

LCK 92-05

STATE OF NEW JERSEY        )  
  )  SS.  
COUNTY OF SALEM            )

Stanley LaBruna, being duly sworn according to law deposes and says:

I am Vice President - Nuclear Operations of Public Service Electric and Gas Company, and as such, I find the matters set forth in our letter dated JUL 08 1992, concerning the Hope Creek Generating Station, are true to the best of my knowledge, information and belief.

Stanley LaBruna

Subscribed and Sworn to before me  
this 8th day of July, 1992

Sherry L. Cagle  
Notary Public of New Jersey

SHERRY L. CAGLE  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires March 5, 1997

My Commission expires on \_\_\_\_\_

ATTACHMENT 1  
PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

LICENSE AMENDMENT APPLICATION  
CLARIFICATION OF REQUIREMENTS FOR LICENSED  
OPERATOR QUALIFICATIONS AND TRAINING  
HOPE CREEK GENERATING STATION  
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I. Description of Change

NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses", was published in November 1987 to document the information and guidance provided by the NRC on the requirements of the revised 10CFR55, "Operator's Licenses". The answer to Question 98 of NUREG-1262 states that a facility with an accredited training program, that has a more restrictive requirement in their Technical Specifications (TSs) than required by the rule, is permitted to apply for relief and that the change would be considered an administrative change to conform with the revised regulation.

NUREG-1262 indicates that accreditation obviates the need to conform to Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," Revision 2, and the associated standards endorsed by the RG 1.8 (i.e., ANSI/ANS 3.1 and ANSI/ANS 18.1). Specifically, Question 100 states that a facility which has an accredited program is no longer obligated to follow RG 1.8 and that the NRC considers the INPO guidelines equivalent to the staff guidelines contained in the RG. PSE&G's licensed operator training programs have been accredited by INPO and are based on a systems approach to training. Licensed operator qualifications and the licensed operator retraining and replacement training programs must comply with the requirements of the revised 10CFR55 which, as stated in NUREG-1262, supersedes the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees.

This amendment application is being submitted in accordance with the above guidance and proposes changes to TSs 6.3.1 and 6.4.1 to delete TS requirements that are superseded based on accreditation of our licensed operator training programs, adoption of a "systems approach to training", and promulgation of the revised 10CFR55. The following administrative changes are proposed to clarify the current requirements for licensed operator qualifications and training:

1. Delete the requirement from TS Section 6.3.1 that licensed operators meet or exceed the minimum qualifications of ANSI/ANS 3.1-1981 and the supplemental requirements specified in Sections A and C of the March 28, 1980 NRC letter to all licensees. This is replaced by a requirement that licensed operators comply with the requirements of 10CFR55.

2. Delete the requirement from TS Section 6.4.1 that the licensed operator retraining and replacement training programs meet or exceed the requirements of ANSI/ANS 3.1-1981 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees. This is replaced by a requirement that the training programs comply with the requirements of 10CFR55.

The licensed operator qualifications and training programs will continue to be required to comply with the requirements of 10CFR55, and the qualifications and training programs for all other affected unit staff will continue to be required to meet or exceed the standards of ANSI/ANS 3.1-1981 (except for the Radiation Protection Manager who will continue to be required to meet or exceed the qualifications of RG 1.8, September 1975).

## II. Reason for Change

These changes are being proposed to delete TS requirements that are superseded based on accreditation of our licensed operator training programs, adoption of a "systems approach to training", and promulgation of the revised 10CFR55, "Operator's Licenses", which became effective on May 26, 1987.

## III. Justification for Change

This Change Request involves a proposed administrative change to the TS to clarify the current requirements concerning licensed operator qualifications and training programs. The TS requirements for all other affected unit staff qualifications and training programs remain unchanged. The licensed operator qualifications and training programs will continue to be required to comply with the requirements of 10CFR55. Licensed operator qualifications and training can have an indirect impact on accidents previously evaluated; however, the NRC considered this impact during the rulemaking process, and by promulgation of the revised 10CFR55 rule, determined that this impact remains acceptable when licensees have an accredited licensed operator training program which is based on a systems approach to training. This is because the NRC has concluded, as stated in NUREG-1262, that the standards and guidelines applied by INPO in their training accreditation program are equivalent to those put forth or endorsed by the NRC. Therefore, maintaining INPO accredited, systems based licensed operator training programs is equivalent to maintaining NRC approved licensed operator training programs which conform with applicable NRC Regulatory Guides or NRC endorsed ANSI/ANS standards. Additionally, the proposed TS changes do not affect plant design, hardware, system operation, or procedures.

#### IV. Significant Hazards Consideration Evaluation

The proposed changes to the Hope Creek Generating Station Technical Specifications:

1. Do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed TS changes are administrative changes to clarify the current requirements for licensed operator qualifications and training programs and to conform to the revised 10CFR55 rule. Although licensed operator qualifications and training can have an indirect impact on accidents previously evaluated, the NRC considered this impact during the rulemaking process, and by promulgation of the revised rule, concluded that this impact remains acceptable as long as licensed operator training programs are accredited and based on a systems approach to training. PSE&G's licensed operator training programs have been accredited by INPO and are based on a systems approach to training. The proposed TS changes take credit for the INPO accreditation of the licensed operator training programs and require continued compliance with the requirements of 10CFR55. The TS requirements for all other unit staff qualifications and training programs remain unchanged. Therefore, the proposed TS changes do not increase the probability or consequences of an accident previously evaluated.

2. Do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed TS changes are administrative changes to clarify the current requirements for licensed operator qualifications and training programs and to conform to the revised 10CFR55 rule. The changes do not affect plant design, hardware, system operation, or procedures. Additionally, in promulgating the revised rule, the NRC concluded that the impact of the revised rule on the possibility of creating a new or different kind of accident is acceptable as long as licensed operator training programs are accredited and based on a systems approach to training. As noted previously, PSE&G's licensed operator training programs have been accredited by INPO and are based on a systems approach to training. The proposed TS changes take credit for the INPO accreditation and require continued compliance with the requirements of 10CFR55. The TS requirements for all other unit staff qualifications and training programs remain unchanged. Therefore, the proposed TS changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Do not involve a significant reduction in a margin of safety.

The proposed TS changes are administrative changes to clarify the current requirements for licensed operator qualifications and training programs and to conform to the revised 10CFR55 rule. Licensed operator qualifications and training can have an indirect impact on a margin of safety; however, the NRC, in promulgating the revised rule, determined that the impact on margin of safety was acceptable when licensees maintain licensed operator training programs that are accredited and based on a systems approach to training. As noted previously, PSE&G's licensed operator training programs have been accredited by INPO and are based on a systems approach to training. The NRC has concluded, as stated in NUREG-1262, that the standards and guidelines applied by INPO in their training accreditation program are equivalent to those put forth or endorsed by the NRC. As a result, maintaining INPO accredited, systems based licensed operator training programs is equivalent to maintaining NRC approved licensed operator training programs which conform with applicable NRC regulatory guides or NRC endorsed ANSI/ANS standards. The TS requirements for the qualifications and training programs for all other unit staff remain unchanged. The licensed operator qualifications and training programs will continue to be required to comply with the requirements of 10CFR55. The margin of safety is maintained by virtue of maintaining INPO accredited licensed operator training programs and through continued compliance with the requirements of 10CFR55. Therefore, the proposed TS changes do not reduce a margin of safety.

V. Conclusion

As discussed in Item IV above, PSE&G has concluded that the proposed changes to the Technical Specifications do not involve a significant hazards consideration since the changes (i) do not involve a significant increase in the probability or consequences of an accident previously evaluated, (ii) do not create the possibility of a new or different kind of accident from any accident previously evaluated, and (iii) do not involve a significant reduction in a margin of safety.