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January 20, 1993
C321-93-2017

Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Supplemental Information in Support of
Request for Scheduler Exemption from
Requalification Testing Requirements

Ref: GPUN Letter C321-92-2347 from C.A. Mascari to Director,
Office of NRR, dated January 4, 1993.

In the letter referenced above, GPUN requested a scheduler exemption from the requirements of 10 CFR 55.59(a)(1) and (c)(1) to allow the current requalification program duration to be extended from 24 to 32 months. This would allow both the written and operating portions of the requalification exam to be jointly administered by the NRC and GPUN in August 1993 when the new plant referenced simulator will be available for all aspects of operator evaluation. In a telephone conference with the NRC on January 15, 1993, GPUN provided additional information in support of the exemption request. This information is documented in Attachment 1.

This exemption is requested to resolve a unique one-time situation. As stated previously, we believe this exemption is the most logical and efficient resolution to the scheduling challenges in meeting 10 CFR 55.59 operator requalification requirements during this transitional period when the new plant referenced simulator is being integrated into our operator training programs. Attachment 1 describes additional compensatory actions that will be taken in our licensed operator requalification training program during the period of exemption in the event that our request is granted.

The attachment specifically addresses the issue of operator stress. Based on past experience, we believe the exemption would relieve a significant amount of undue operator stress by allowing administration of all portions of the requalification exam in a short time interval. Further, we strongly believe the exemption would allow GPUN to prepare a better quality written exam that will produce a more meaningful assessment of our operator skills and their training program. Without this exemption Operations and Training Department

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personnel and resources would be significantly diverted from ongoing 14R refueling outage activities, simulator site acceptance testing, and simulator training scenario development and validation.

If there are any questions regarding this matter, please call Mr. Michael Heller, Licensing Engineer, at (609) 971-4680.

Sincerely,



C.A. Mascari
Vice President & Director
Nuclear Assurance

Attachment

cc: NRC Document Control Desk
Mr. L. Bettenhausen, NRC Region I
Senior NRC Resident Inspector
Oyster Creek NRC Project Manager

Attachment 1

The following information is provided in support of the subject exemption request:

1. Operator Stress

The exemption would relieve a significant amount of undue operator stress. Previously, the use of the Nine Mile Point Unit 1 simulator for the dynamic simulator portion of the exam necessitated delays between the administration of the written and operating portions of the exam of several months. Feedback from both operators and examiners indicated that being in an "examination mode" for such an extended period was stressful.

Additionally, the few operators who failed in the initial phases of the exam could not be remediated until the exam process was complete and a determination made on the adequacy of the requalification training program. This resulted in some operators being off shift in an unqualified status for months and this in turn seemed to affect some individual's attitudes regarding self-image and esteem. This is another aspect of stress related to a protracted exam process.

Administration of a written exam in March/April with an operating test in August creates the same situation as above. It is our objective to minimize this type of stress and we believe our efforts are in keeping with the spirit and intent of SECY-91-391 (NRC staff letter to the Commissioners) entitled "Results of the Study of Requalification Examination Stress", dated December 3, 1991.

2. Exam Quality

The exemption would allow for a more complete and systematic development of a static simulator exam for the following reasons:

- a. Simulator Modifications - The cutoff date for modifications that were included with the simulator was 1988. Allowing the written exam to occur with the operational exam in August 1993 will provide 5 months to add as many modifications as possible. A better quality static simulator exam would result if the exam is conducted after these modifications are in place.
- b. Validation of Simulator Scenarios - Understandably, the simulator is not scheduled to support the development and validation of static and dynamic simulator scenarios until after Site Acceptance Testing (SAT). There would be little time to complete and thoroughly review and validate the static exam bank prior to a March/April 1993 exam. Here again, overall exam quality would be impacted.

- c. Emergency Operating Procedures (EOPs) - An upgrade of the EOP flowchart format, elimination of the text version of EOPs and the addition of EOP support procedures is in progress. This effort is expected to be completed concurrent with the end of our 14R refueling outage in mid-February. Additionally, the EOPs have been significantly impacted by several 14R modifications. There would be little time to develop and validate new EOP based questions for a March/April exam.

We believe that the benefits of the requalification exam process include identifying areas for individual operator upgrade as well as those portions of our requalification training program for enhancement. Our plant referenced simulator will provide the cornerstone for this process, however the quality of a static simulator portion of a written exam done on the machine in March/April will be significantly less than that of the same effort conducted later in the year. In all probability, some opportunities for improvement will be missed if the exemption is not granted.

3. Other Factors

Without the requested exemption, comprehensive written exams would have to be administered in March/April 1993. In order to accomplish this, Operations and Training department personnel and resources would have to be significantly redirected. This is highly undesirable for the following reasons:

- a. 14R Refueling Outage - The outage began on November 27, 1992 and is scheduled to be completed by mid-February 1993. Redirecting certain key operations personnel at this time to prepare for a comprehensive written exam in March/April may impact the progress of the outage to some extent.
- b. Simulator Development - 6 operations training instructors are currently participating in Site Acceptance Testing (SAT) of the simulator which is scheduled to be completed by January 31, 1993. Redirecting these instructors during this effort to prepare for a comprehensive written exam in March/April 1993 will have a direct impact on the progress of simulator development.
- c. Training Impact - As described above in item b, a slippage in the simulator development schedule caused by a March/April comprehensive written exam will have a spill-over effect in the area of simulator training scenario validation and development. This effort is set to

dramatically increase upon completion of Site Acceptance Testing. Any significant impact on the validation and development effort will adversely impact the quality of simulator training in the initial months of operator exposure to the machine - a time when initial operator perceptions of the machine will be fully established.

This exemption is requested to resolve a unique one-time situation. The plant referenced simulator was certified on December 31, 1992 and is scheduled to be available for conducting an operating test in August 1993. This schedule reflects the need to conduct 3 cycles (6 months) of training on the simulator before a test is conducted. During this interim period when the new plant referenced simulator is being integrated into our training programs, we are striving to provide our operators with the best possible requalification training.

4. Additional Information

The following schedule identifies the number of operators needing a written exam in 1993:

<u>Month</u>	<u>No. of Operators</u>
March	15
April	15
May	19
June	14

In addition, there are 9 operators whose licenses expire before the end of 1994 and who have not had a comprehensive requalification written exam and operating test administered by the NRC during the term of their six-year licenses as required by 10 CFR 55.57(b) for license renewal. License expiration dates for the next two years are as follows:

<u>Operator</u>	<u>License No.</u>	<u>Docket No.</u>	<u>Exp. Date</u>
E. Irizarry	OP5695-3	55-7694	10/27/93
D. Pietruski	SOP10073-2	55-7124	11/03/93
G. Voishnis	SOP10712	55-60537	11/11/93
J. Costic	OP5906-3	55-7564	03/27/94
B. Anderson	OP10698	55-60526	05/14/94
W. Reilly	OP10701	55-61052	05/20/94
J. Boyle	SOP10213-2	55-7562	09/11/94
G. Cropper	SOP10216-2	55-7690	09/11/94
N. Boulware	SOP3403-5	55-4338	12/13/94

As a minimum, it is planned to have all the above personnel examined by the NRC in 1993.

5. Additional Compensatory Actions

During the exemption period, we will administer cyclic written quizzes that cover both the current training cycle subjects and previous biennial training. At least 20% of the written quizzes will cover previous biennial training. Thus, they will be comprehensive in nature. Additionally, at least a portion of the weekly quiz will be either in a Section A or Section B format as defined in the NRC Examiner Standards (NUREG 1021). Also, we will administer a dynamic simulator scenario as part of each training cycle's evaluation. Any identified individual or crew weaknesses will be appropriately addressed in the following week (relief week) for the individual/crew involved. This is in addition to our prioritized plan of areas for simulator training emphasis that will be finalized by January 31, 1993. These areas for improvement were identified by review of past requalification exams, INPO audits, Oyster Creek vs. Nine Mile Point Unit 1 simulator differences, Oyster Creek operating experience, other utility operating experience and selected industry reports. These areas will be covered in our simulator training efforts over the period of the requested exemption. Any additional identified areas will be factored into training utilizing the framework provided by our systematic approach to training.