



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN  
VICE PRESIDENT  
NUCLEAR

September 30, 1985  
PY-CEI/NRR-0361 L

Mr. B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Perry Nuclear Power Plant  
Docket Nos. 50-440; 50-441  
Perry Licensed Operator  
Requalification Program

Dear Mr. Youngblood:

The attachment to this letter further clarifies our response to your request for additional information concerning the Perry Licensed Operator Requalification Program dated June 25, 1985. This submittal supplements our original response dated August 22, 1985. Based upon the attached information, we anticipate receipt of your approval of the Perry Licensed Operator Requalification Program.

Please feel free to contact me should you have any further questions.

Very truly yours,

Murray R. Edelman  
Vice President  
Nuclear Group

MRE:njc

Attachment

cc: Jay Silberg, Esq.  
John Stefano (2)  
J. Grobe

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Question

1. Number 1 of your description of licensed duties allows an individual to assist RO's or SRO's in the performance of their duties. Appendix A of 10 CFR Part 55 under #3 of the Requalification Program Requirements states that individuals must manipulate (RO) or direct (SRO) the activities of individuals during plant control manipulations. Explain the responsibilities and under what circumstances individuals would fall into the category of providing assistance.

Response

1. "Assist" as referred to in Number 1 of Licensed Duties applies only to those SRO's who are not regularly assigned shift supervisory responsibilities. These individuals will function as an "extra man on-shift", and will assume SRO responsibilities in coordination with the regular shift team. On-shift time is used to maintain the licensed individual's familiarity with shift practices and plant status. Required reactivity manipulations, while not overlooked during on-shift assignments, will be accomplished on the PNPP simulator.

Question

5. The criteria for accelerated training in your program meets neither the intent of the commissioner's position nor current industry standards. Accelerated training should be provided on a timely basis in the area(s) where licensed personnel exhibit deficiencies. We therefore, request you modify your program to state that licensed personnel will be suspended from licensed duties when:
- a) Overall grade on the annual written examination is less than 80% overall and less than 70% in a category.
  - b) Annual oral examinations or evaluations made by supervisors and/or training staff members of the performance and competency of licensed personnel during actual or simulated abnormal and emergency conditions clearly indicate the need for accelerated training.

Waiver of suspension from licensed duties will be considered if the Station Superintendent develops an Operations and Training Review Board that comprises members of the station senior staff members. The Board should review the licensed individual's past performance, evaluate deficiencies and recommend a training program before waiving suspension of licensed duties. The evaluation shall be completed within seven working days of the original findings. Accelerated training and reexamination must be completed within 30 days of the Board's recommendations.

Response

5. Overall grade on the annual examination of less than 80%, or a category score of less than 70% will result in the immediate removal of licensed responsibilities from the licensed individual. Additionally, failure of oral examinations performed as part of the annual requalification examination process will result in immediate removal of the individual from licensed responsibilities. A management review of the individuals past operating performance, simulator performance and training history shall be conducted prior to initiation of accelerated training or a waiver from suspension.

A waiver from suspension may be requested by the General Supervisor - Operations for a period of 30 days. The request will state the justification for waiver, and will be submitted to the Vice President - Nuclear Group for Approval. The Vice President - Nuclear Group shall gather information from Training, Operations or other functions as necessary prior to authorizing a waiver. The NRC will be notified of any suspensions from licensed activities and/or waivers. In the event of a waiver, accelerated training and reexamination shall be completed within 30 days of the waiver date.