

TENNESSEE VALLEY AUTHORITY

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MAY 16 1988

U.S. Nuclear Regulatory Commission  
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Washington, D.C. 20555

Gentlemen:

In the Matter of	)	Docket Nos. 50-259
Tennessee Valley Authority	)	50-260
		50-296

BROWNS FERRY NUCLEAR PLANT - RETESTING OF GROUP IV OPERATORS

Reference: K. P. Barr's letter to S. A. White dated April 13, 1988,  
"Utilization of Browns Ferry Group 4 Operators for Licensed Duties"

The referenced letter transmitted NRC's summary evaluation of the Group IV Accelerated Requalification Program testing conducted in March 1988 at Browns Ferry. NRC found that TVA had satisfied the training commitments stated in response to NRC's Confirmation of Action Letter (CAL 50-259/86-01, 260/86-01, and 296/86-01) dated January 2, 1986. Your letter, however, indicates that before unit 2 startup, NRC would administer an additional requalification examination to the Group IV operators. Furthermore, you specified that the Group IV operators be utilized only for refueling and shutdown activities before the NRC reexamination. These conditions are contrary to TVA's previous understanding that successful completion of the requalification tests for the Group IV operators would close the CAL commitments and that our operator training examination schedules would return to that specified by 10 CFR Part 55. Your schedule for NRC examinations represents a considerable impact to TVA in that the Group IV operators will have to again be removed from shift to take the examinations in the same timeframe that extra operations staffing is needed to prepare for startup. Accordingly, we are requesting that you reconsider this plan. Additional background for this subject is outlined below.

TVA's basic commitment was to conduct an intensive Accelerated Requalification Program for all operators. The operators were subsequently divided into four groups to participate in the program. The Accelerated Requalification Program initially consisted of a 16-week agenda which was progressively expanded to 28 weeks for the last operator group. The course agenda involved segments in reactor and thermodynamics theory, including application, simulator exercises, emergency operating procedures, communication skills, and a host of other topics.

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U.S. Nuclear Regulatory Commission

MAY 16 1988

NRC was closely involved in the program and administered the requalification tests for Groups I, II, and III. TVA likewise tested each group of operators. It was the intent of both TVA and NRC that Group IV would also be tested by NRC at the end of the training program in March 1988. However, NRC generically suspended administration of requalification tests in the Fall of 1987 pending the development of a new performance based test methodology for the industry. NRC did audit the administration of TVA's requalification test and related test material for Group IV and found the program satisfactory according to your April 13, 1988 letter and Inspection Report 50-259, 260, 296/88-08. Considering the success rate of the first three operator groups and the associated NRC involvement in the testing program for all four groups, TVA is confident that the integrity of the operator training program has been satisfactorily demonstrated.

It was also our understanding that once NRC had finalized its new policy and technique for requalification examinations, Browns Ferry would be one of the first plants examined. The Group IV operators would be returned to individual shift crews or assigned duties consistent with plant needs and would thereafter be considered as part of the general operator population subject to selection in accordance with applicable provisions of 10 CFR 55. This standard approach is identical to that applied at other nuclear plants in that the Browns Ferry operator population as a whole is subject to random selection. Also, since the new test methodology emphasizes testing established shift crews, segregation of Group IV operators as a unique test group appears to be a change in general staff policy.

Additionally, NRC's proposal to retest Group IV will impose a psychological stress on the individual operators in this group. These operators underwent a rigorous requalification training and test program on which their continued employment is dependent. They would have obviously preferred to have taken the NRC examination following the training program completion in March 1988. The prospect of taking a delayed examination, particularly considering that an entirely new methodology will be employed, unnecessarily increases the anxiety level of this specific group.

In summary, TVA's position is that we have fulfilled our commitments related to the Accelerated Requalification Program and specifically that the Group IV operators resume normal license duties. Browns Ferry operators should be selected and examined in the same manner used for the other utilities.

We would like to express our appreciation for NRC's efforts and assistance throughout the entirety of the Accelerated Requalification Program. Please call M. J. May at Browns Ferry, extension 3566, should you require additional information or to arrange followup discussions on this specific

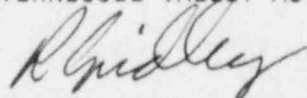
U.S. Nuclear Regulatory Commission

MAY 16 1988

issue. Your early response to this matter would be of great assistance to our scheduling activities.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



R. Gridley, Director  
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