



Point Beach Nuclear Plant  
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Document Control Desk  
U. S. NUCLEAR REGULATORY COMMISSION  
Mail Station P1-137  
Washington, DC 20555

Ladies/Gentlemen:

DOCKET 3 50-266 AND 50-301  
REVISION OF DTA COMMITMENTS TO  
SUPPORT THE TRANSITION TO ON-SHIFT STAs  
POINT BEACH NUCLEAR PLANTS, UNITS 1 AND 2

Transition to an On-Shift Shift Technical Advisor Position

Point Beach Nuclear Plant (PBNP), Units 1 and 2, currently use a Duty Technical Advisor (DTA) to satisfy the requirements and guidance of NUREG-0737, NUREG-0578 Appendix X and NUREG-1275 regarding Shift Technical Advisors (STAs). The DTAs work a nominal 24-hour shift and remain within 10 minutes of the control room at all times.

We recognize the advantages of an on-shift STA wherein the STA has definitive assignments to support the operating crew. These advantages were highlighted in Information Notice 93-81. PBNP is scheduled to implement an STA position in January 1999. To enable this transition, we seek to revise previous commitments associated with the DTA position that will not apply to the on-shift STA. Also, we are revising our requirements for personnel experience of STAs to bring PBNP into conformance with industry standards. Three of the STA candidates do not meet the PBNP plant experience guideline as described by INPO 90-003, "Guidelines for the Training and Qualification of Shift Technical Advisors." To expeditiously bring PBNP up to current industry practices on implementation of the STA requirement, we would like to assign these individuals to active STA on-shift duties before they fully meet the plant experience guideline. Details of the commitment revisions and the bases follow.

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### Revisions to Previous Commitments

The original STA position is described in the PBNP response to Generic Letter 86-04, "Engineering Expertise On Shift," C. W. Fay to T. Colburn, dated May 12, 1986 (Reference 1). The following revisions were implemented in the DTA program since that time.

1. DTAs are no longer housed at the site boundary control center. Their living quarters were moved inside the protected area.
2. DTAs are no longer responsible for routine checks of radiation monitoring hardware in the emergency response facilities. This responsibility was reassigned when the DTA housing was moved inside the protected area.
3. The DTA will (in some instances) respond to the control room from the site boundary control center.

Elements of the DTA program that will no longer be applicable following implementation of STAs at PBNP are listed below. These changes are the result of the transition from a 24-hour watch to a shift rotation.

1. DTAs not on call will provide technical support to the technical support center staff similar to the support provided by the on-watch DTA to the operating crew in the control room.
2. Each DTA stands a 24-hour watch, on a 10 to 18-day rotation, depending on the number of DTAs.
3. The DTA turnover process will be performed daily.
4. The DTAs check radiation monitoring equipment in the emergency response facilities.

### Experience Requirements and Licensing Basis

The original experience requirements for PBNP STAs were defined in INPO document, "Nuclear Power Plant Shift Technical Advisor -- Recommendations for Position Description, Qualifications, Education and Training," dated April 20, 1980 (Reference 2). The requirements delineated in this document are specifically endorsed by NUREG-0737, "Clarification of TMI Action Item Requirements." Reference 2 was subsequently revised. Revision 1 was issued April 28, 1981 (Reference 3).

In our response to Generic Letter 86-04, we committed to more restrictive requirements as follows:

“Each member of the program must have at least 18 months of nuclear power plant experience of which a minimum of 12 months has been at Point Beach. The remaining six months of experience may be obtained from a similar nuclear power plant (PWR), a military, or production facility.”

Reference (3) was superseded in January 1990 by INPO 90-003, “Guidelines for the Training and Qualification of Shift Technical Advisors.” The STA experience guidelines recommended in INPO 90-003 are:

Candidates should have at least one-year of experience in the operation or engineering support of a nuclear power plant, with at least six months of experience at the plant where they will serve as STAs. Candidates also should possess sufficient maturity, integrity and experience to establish credibility with the operating crew.

All STA candidates have commercial nuclear power plant experience that is well in excess of the one-year guideline. However, three of the candidates do not have the six months of experience at PBNP recommended by INPO. Because these three candidates were hired from outside Wisconsin Electric in support of an aggressive effort to transition to STAs, they had little or no previous plant-specific experience prior to the start of the STA class in April 1998. While we agree that optimally, it would be better for the three STA candidates to have in-plant experience at PBNP, we do not feel that the benefit would be as significant as the benefit of an earlier transition to STAs.

For this initial STA class, we plan to assign three of the STAs on shift without six months of PBNP experience. We will limit administrative duties of the STAs to compensate for the lack of plant-specific experience. If the STA needs assistance with an administrative process, crew supervision will be available to provide it. For subsequent STA classes, we will meet this guideline. Note that these three candidates have all significantly more experience than INPO 90-003 guidance. One candidate has 2.5 years of experience engineering and completed a 15-month STA qualification program; one candidate has 11 years of experience as an STA and an engineer; and the third candidate has almost 15 years of experience and has formerly held a Senior Operator's License. We believe this experience, though it was acquired at other plants, will help to ensure that these candidates are successful in carrying out their non-emergency roles.

We discussed the six-month plant experience requirement with INPO representatives. It appears that the basis of the requirement is not associated with emergency responsibilities. The plant experience provides the STA candidate with an opportunity to develop an understanding of the plant organization and administrative processes. This knowledge allows the STA to more

effectively support the plant in his or her non-emergency work assignments in support of the plant operation. Thus, the fact that several of the STA candidates lack this plant-specific experience will not impact their ability to support the operating crews during an emergency as they carry out their STA responsibilities.

Please note that although the previous experience requirements included experience at a similar facility (i.e., at a PWR), INPO 90-003 does not specify that experience should be at a similar facility. Both BWR and PWR experience can be used to meet the current STA 12-month nuclear experience guideline.

#### License Amendment

No license amendment is required for transition to STAs at PBNP. The STAs will serve as the DTA. They will continue to perform the duties and functions and meet all requirements of the DTA position as required by Technical Specifications 15.6.2.2 (Items 2 and 6) and 15.6.3.4. An administrative Technical Specifications change will be submitted to change the terminology from "DTA" to "STA" in coordination with other change requests. Plant administrative procedures and the FSAR will be revised to reflect these changes as required.

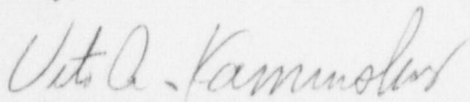
#### New Commitments

There is one new commitment contained in this letter:

*Contingent upon NRC approval of this submittal, PBNP will transition to STAs no later than the end of the first quarter of 1999.*

Please do not hesitate to contact us if you have any questions related to this request.

Sincerely,



Vito A. Kaminskas  
Manager,  
Regulatory Services & Licensing

Attachment

cc: NRC Resident Inspector                      NRC Project Manager  
      NRC Regional Administrator

ATTACHMENT 1

STA CANDIDATE EDUCATION AND EXPERIENCE SUMMARY

<u>Candidate</u>	<u>Degree</u>	<u>Degree Received From</u>	<u>Other Commercial Experience</u>	<u>Point Beach Experience</u>
1	BSME	University of Wisconsin	2-1/2 years BWR system engineering 15 months BWR STA training	No experience outside the STA qualification program
2	BSME	University of Illinois	11 years BWR STA and engineer	No experience outside the STA qualification program
3	BS Chemistry	University of Illinois	10 years PWR, Chemistry and Operations	No experience outside the STA qualification program
4	BS Physics MS Industrial Technology	University of Maryland University of Miami	17 years at PWRs, licensed twice	9 months as QA engineer
5	BS Nuclear Technology	University of New York	14-1/2 years BWR experience SRO Licensed, Operator Instructor Engineering Instructor	10 months as ES instructor