



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

April 15, 1986

Docket No. 50-267

Mr. R. F. Walker, President  
Public Service Company of Colorado  
Post Office Box 840  
Denver, Colorado 80201-0840

Dear Mr. Walker:

SUBJECT: FORT ST. VRAIN - SAFETY EVALUATION OF 1985-1986 LICENSED  
OPERATOR REQUALIFICATION PROGRAM

We have completed our review of your letter of January 28, 1986 (P-86006) in which you requested that instructors who hold only Reactor Operator (RO) Licenses be permitted to teach courses in systems, integrated responses and transients during the current (1985-1986) Licensed Operator Requalification Training Program. Item I.A.2.3 of NUREG-0737 requires that these courses be taught by instructors who hold Senior Reactor Operator (SRO) Licenses. Although Public Service Company of Colorado (PSC) does not have enough permanently assigned SRO instructors to teach the above courses, per Item I.A.2.3 of NUREG-0737, PSC has committed to having an SRO-licensed instructor review and approve all lesson plans used in the requalification program. PSC has also committed to having certain courses in the requalification program taught only by an SRO-licensed instructor.

After discussion with the Operator Licensing Branch, Region IV, and in consideration of the commitments made in the subject PSC letter, we have concluded that, for the 1985-1986 Licensed Operator Requalification Training Program only, it is acceptable for PSC to use experienced RO-licensed training instructors and technically competent guest lecturers, under the supervision of an SRO-licensed individual, to teach selected courses. However, for the period after November 1986, in accordance with the subject PSC letter, PSC is expected to upgrade their Licensed Operator Requalification program to satisfy the specific instructor qualification requirements of Item I.A.2.3. of NUREG-0737. The results of our review are contained in the enclosed safety evaluation.

We have also determined that the Fort St. Vrain requalification program requires better definition of criteria and tighter constraints for the accelerated training program. The staff discussed its concerns on this issue with PSC staff on March 5 and 6, 1986. PSC should submit a copy of the current requalification program addressing these concerns for NRC review, in accordance with Generic Letter 84-14.

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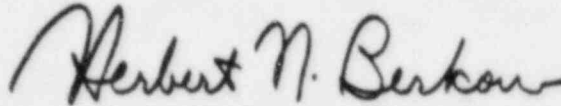
Mr. R. F. Walker

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If you have any questions or comments regarding the above please contact Charles Hinson, NRC Co-Project Manager for your facility, at (301) 492-7930.

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

Handwritten signature of Herbert N. Berkow in cursive script.

Herbert N. Berkow, Director  
Standardization and Special  
Projects Directorate  
Division of PWR Licensing-B

Enclosure:  
As stated

cc w/enclosure:  
See next page

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Fort St. Vrain

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATING TO LICENSED OPERATOR REQUALIFICATION PROGRAM

PUBLIC SERVICE COMPANY OF COLORADO

FORT ST. VRAIN, UNIT NO.1

DOCKET NO. 50-267

1.0 INTRODUCTION

In response to Items I.A.2.1 and I.A.2.3 of NUREG-0737, "Clarification of TMI Action Plan Requirements," Public Service Company of Colorado (PSC) submitted a revised Licensed Operator Requalification Program on January 2, 1981. In a letter to PSC, dated March 24, 1982, the staff reviewed and accepted PSC's responses to Items I.A.2.1 and I.A.2.3. Section 9 of the Requalification Program requires all instructors who teach systems, integrated responses and transients to have a Senior Reactor Operator (SRO) License and be enrolled in the Requalification Program. In addition, guest lecturers who are experts in particular subjects are not required to have a SRO License.

2.0 LICENSEE REQUEST

Due to attrition and promotion of training personnel, PSC, in a letter of January 28, 1986, requested that two instructors who hold Reactor Operator (RO) Licenses be permitted to teach courses in systems, integrated responses and transients during the current (1985-1986) Licensed Operator Requalification Training Program. Item I.A.2.3 of NUREG-0737 requires that these courses be taught by instructors who hold SRO Licenses. PSC supports this request with the following commitments:

- o All lesson plans used in the program are reviewed and approved by an SRO-licensed instructor in accordance with the Training Department procedures. Technical content of the lesson plans is verified during a technical review prior to instruction.
- o Only the SRO instructor may teach selected classes.
- o The licensed RO instructors teach selected classes under the supervision of an SRO instructor.

- o Guest lecturers permanently assigned to the training staff conduct classes only in the areas of their specialty.

The RO instructors are enrolled in the requalification program; however, they may be excused from examinations if they administer or grade the examination. PSC provided a schedule of the Requalification Program which identified the instructor and lecture subject matter. PSC also plans to enroll the RO instructors in an SRO training program beginning in March 1986, and be in full compliance by November 1986.

### 3.0 EVALUATION AND CONCLUSIONS

During our review process we noted that the last scheduled requalification training rotation cycle at Fort St. Vrain began the week of March 3, 1986, and will be completed during the week of April 4, 1986. The annual oral and written requalification examinations are scheduled for the weeks of April 7 through May 9, 1986. On March 5 and 6, 1986, we discussed portions of the requalification subject matter and evaluation methods with PSC licensing and training personnel. We also discussed performance of licensed personnel during requalification examinations given by the Operator Licensing Branch (OLB) Staff in Region IV (RIV).

We have evaluated the subject areas presented by licensed SRO, RO and guest instructors and find, with the commitments specified by PSC, the subject areas and instructors are acceptable. During discussions with PSC staff on March 5 and 6, 1986, we determined that Requalification Program quizzes and examinations are:

- o developed from objectives contained in approved lesson plans in accordance with PSC Training Department procedures and
- o quizzes are administered during each shift rotation of the requalification cycle.

Since the program provides for periodic evaluation of licensed personnel in the subject matter presented during the Requalification Program, we conclude there is adequate oversight by PSC to allow the use of non SRO-qualified instructors to teach certain courses during the 1985-1986 requalification cycle only. However, after November 26, 1986, PSC is expected to upgrade their operator requalification program to satisfy the specific instructor qualification requirements of NUREG-0737, Item I.A.2.3.

During discussions with the OLB staff in RIV, we determined that RIV plans to administer requalification examinations during May 1986. RIV evaluations should provide an additional evaluation of qualifications of licensed personnel and, indirectly, of the instructors' capabilities.

Principal Contributors:

J. Buzy  
C. Hinson

Dated: April 15, 1986

April 15, 1986

Mr. R. F. Walker

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If you have any questions or comments regarding the above please contact Charles Hinson, NRC Co-Project Manager for your facility, at (301) 492-7930.

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

original signed by  
Herbert N. Berkow, Director  
Standardization and Special  
Projects Directorate  
Division of PWR Licensing-B

Enclosure:  
As stated

cc w/enclosure:  
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