



Scott A. Patulski
Site Vice President

Point Beach Nuclear Plant
6610 Nuclear Rd.
Two Rivers, WI 54241

Phone 920 755-6214

NPL 98-0609

10 CFR 55

July 20, 1998

Mr. John A. Grobe, Director
Division of Reactor Safety
US Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, IL 60532-4351

SENIOR REACTOR OPERATOR ELIGIBILITY REVIEW:
RESPONSE TO REQUEST FOR INFORMATION
POINT BEACH NUCLEAR PLANT

The purpose of this letter is to respond to your request, pursuant to 10 CFR § 55.31(b) on June 18, 1998, to provide "the rationale for the reduction in the Point Beach [senior reactor operator] eligibility requirements," since our program's initial accreditation in 1986 and the implementation of the 10 CFR Part 55 amendments in 1987.

It is our position that the senior reactor operator eligibility requirements have not been reduced since the accreditation of our training program ("TRPR") by INPO in 1986 and our certification of its use of a "systems approach to training" in implementing 10 CFR Part 55 on June 10, 1987.

Your letter specifically points to "detailed prerequisites taken from NUREG-1021, Revision 5, dated January 1, 1989," in our TRPR 19.0, "Senior Reactor Operator Training," Revision 8 (dated June 19, 1989), which were removed in a subsequent revision to the procedure (Revision 20, dated August 8, 1997). Section 3.2 of the previous revisions of TRPR 19.0 (specifically Revisions 17 through 19) listed "[a]dditional criteria to be considered for the Senior Reactor Operator position," TRPR 19.0, Rev. 19 § 3.2 (emphasis added), not "detailed prerequisites." The "additional criteria to be considered" and their sources were deleted from Revision 20 of the TRPR, in that they are not part of our licensing commitments, are not licensing requirements as documented in our Technical Specifications and Final Safety Analysis Report, and could cause confusion due to differing criteria. The eligibility requirements that are consistent with our licensing bases appear in Section 3.1 of each revision to TRPR 19.0. Removal of the "additional criteria to be considered" was a conscious decision by senior plant management to eliminate confusion by only including the standards committed to in our Technical Specifications, Final Safety Analysis Report, and accredited training program. The eligibility requirements have been reviewed in accordance with the INPO accreditation objectives and criteria. Our training program received unqualified renewal in February 1998 and

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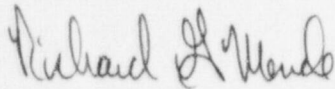
during each preceding accreditation review since 1986. As stated in the final rule implementing 10 CFR Part 55 in 1987, "a facility licensee's training program would be approved [by the NRC] by being accredited by the National Nuclear Accrediting Board," and, as reflected in our May 20, 1998, letter to you, INPO accreditation has been endorsed by the NRC. Our commitment to implementing 10 CFR Part 55 continues to be through the INPO accreditation process and compliance with the INPO accreditation objectives and criteria.

It is important to note that Point Beach uses the education and experience requirements for establishing initial eligibility to *enter the selection process* but makes our senior reactor operator license candidate determinations based on the results of extensive candidate testing and interviews during the training process. In addition, the license candidates are not selected for final examination until after completion of the accredited program.

Reactor and personnel safety remain the top priority at Point Beach. We believe that the process used at Point Beach to determine senior reactor operator applicant eligibility, from application through final selection as a senior reactor operator trainee, is comprehensive and in compliance with 10 CFR Part 55 and the INPO accreditation criteria. These eligibility requirements have not been reduced for the current class of candidates and fully meet our stated commitments. These requirements have been consistently applied to this and all previous senior reactor operator license candidates.

Should you have any additional questions, please do not hesitate to contact Tom Anderson, Assistant Training Manager at (920) 755-6778 or Paul Smith, Training Coordinator at (920) 755-6416.

Sincerely,



for
Scott Patulski
Site Vice President
Point Beach Nuclear Plant

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