



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001  
November 12, 1997

50-334/412

Mr. J. E. Cross  
President - Generation Group  
Duquesne Light Company  
Post Office Box 4  
Shippingport, PA 15077

SUBJECT: OPERATOR TRAINING PROGRAMS AT BEAVER VALLEY POWER STATION, UNIT  
NOS. 1 AND 2 (BVPS-1 AND BVPS-2) (TAC NOS. M75078 AND M75079)

Dear Mr. Cross:

During a recent telephone conversation between Mr. Tom Burns of your staff and Messrs. Glenn Meyer and Richard Pelton of the NRC staff, Mr. Burns asked why, unlike other licensees, was Duquesne Light Company (DLC) required to submit changes to the BVPS-1 and BVPS-2 licensed operator training programs to the NRC for review and approval. Mr. Burns stated that the basis for this requirement was a letter for Mr. Peter Tam (NRC) to Mr. J. D. Sieber (DLC) dated October 23, 1989. We have reviewed the basis for this requirement; the following is a summary of our findings.

On March 19, 1987, Generic Letter 87-07 (GL 87-07), "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing 10 CFR 55 and Conforming Amendments," was published. GL 87-07, in addition to promulgating the changes to 10 CFR Part 55, pointed out to licensees that it was now permissible to substitute an accredited initial or requalification training program for a program previously approved by the NRC. This substitution could be accomplished upon written notification to the NRC and did not require any NRC staff review. However, due to conflicts between 10 CFR Part 50, Appendix A, requirements and a systems approach to training, licensees were required to certify that the substitute training program was both accredited and based on a systems approach to training (SAT).

SAT-based training programs contain the following five elements: (1) systematic analysis of the jobs to be performed, (2) learning objectives derived from the analysis which describe desired performance after training, (3) training design and implementation based on the learning objectives, (4) evaluation of trainee mastery of the objectives during training, and (5) evaluation and revision of the training based on the performance of trained personnel in the job setting. An important aspect of SAT-based training programs is that the process allows changes to any element of the system based on feedback received from any other element. If a training program was not allowed to change based on the changing needs of the target audience, it would not be considered an SAT-based program.

In the GL 87-07 response to the NRC dated September 11, 1989, Mr. J. D. Sieber, DLC, certified that the BVPS-1 and BVPS-2 licensed operator initial and requalification training programs were accredited and based on a systems approach to training. Mr. Sieber included in the letter assurance that administrative procedures were in place to control changes to the training programs.

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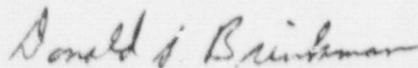
NRC FILE CENTER COPY

In a letter to Mr. J. D. Sieber dated October 23, 1989, Mr. Peter Tam, NRC, acknowledged receipt of the GL 87-07 response. In that letter, Mr. Tam informed Mr. Sieber that "under the provisions of 10 CFR 50.59 licensees may revise the programs, 10 CFR 50.54(i-1) clearly states that any decrease of the scope of an approved operator requalification program would require Commission authorization." From receipt of this letter to present, the licensee has presumed that although the BVPS-1 and BVPS-2 training programs were SAT-based and accredited, any change to the programs considered a decrease in scope required prior Commission approval.

An important portion of 10 CFR 50.54 (I-1) was not addressed in the letter to DLC. This portion of 10 CFR 50.54 (I-1) states that "the licensee may not, except as specifically authorized by the Commission decrease the scope of an approved operator requalification program." However, through GL 87-07 the Commission gave power reactor licensees the authority to change and to even decrease the scope of their operator requalification program without Commission approval. Therefore, DLC is not required to obtain the approval of the NRC to change either of their licensed operator requalification programs.

We apologize for any inconvenience this matter may have caused. Please contact me at (301) 415-1409 if you have any further questions regarding this matter.

Sincerely,



Donald S. Brinkman, Senior Project Manager  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-334  
and 50-412

cc: See next page



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/s/

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Project Directorate I-2  
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