



May 14, 1986 3F0586-19

Office of Nuclear Reactor Regulation Attention: John F. Stoltz, PWR Project Directorate #6 Division of PWR Licensing B United States Nuclear Regulatory Commission Washington, DC 20555

Subject: Crystal River Unit 3 Docket No. 50-302 Operating License No. DPR-72 Response to Generic Letter 86-04

Dear Sir:

Your Generic Letter 86-04, dated February 13, 1986 (but not received until March 7, 1986) was reviewed together with the attached Federal Register Notice of the Commission Policy Statement on Engineering Expertise on Shift. Florida Power Corporation (FPC) responds as follows to the three queries:

 Our current program for providing engineering expertise on shift remains unchanged from our letter 3F1085-01 dated October 1, 1985. This letter, which revised our commitment regarding qualifications of individuals assigned to the STA position, described our program as follows:

> FPC will select individuals to perform STA duties who have bachelor's degrees in a scientific or engineering discipline with at least four years nuclear power experience.

> FPC will provide training specified for STA's by NUREG-0737 and CR-3 Technical Specifications as stated herein. Furthermore, STA's will maintain their qualification through successful completion of an STA requalification program which shall include those topics required for initial STA training.

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> When assigned to the operating shift, the STA is responsible to the Shift Supervisor to provide remedial and technical advise that pertains to the engineering aspects of assuring safe operations of the plant, including the review and evalution of operating experience. The on-shift STA will be on site at all times in a 24-hour shift rotation scheme and be available to report to the control room within ten minutes of being summoned by the Shift Supervisor.

 In accordance with FPC policy and as reinforced in letter 3F1085-01 dated October 1, 1985, FPC "will select individuals to perform STA duties who have bachelor's degrees in a scientific or engineering discipline." No "equivalency" criteria is used.

In September of 1982, in accord with our policy at that time, one individual who did not have a bachelor's degree was selected to perform STA duties. This followed a Fall of 1981 evaluation of equivalency and appointment to the NOTA program. This individual had, at the time of selection, 28 years of power plant experience, including 12 years nuclear plant experience as a shift supervisor, had an International Correspondence School's Diploma in Stationary Steam Engineering (2 years of a 4 year course completed), had completed various community college courses in computer programming, chemistry, physics, mathematics, and engineering drawing, had completed the CR-3 Cold License Training, including Academic Training, North Carolina State University Course, Babcock and Wilcox Design Engineering Course, and SRO license classes, and had attended numerous FPC sponsored courses in electronics and nuclear theory. It is felt that the above training and experience fully complies with NUREG-0737 item I.A.1.1 requirement for a bachelor's degree or equivalent. This individual represents the sole use of "equivalency" for STA selection by FPC.

3. FPC does not, at present, intend to modify its existing STA program in order to take advantage of the options identified in the Commission's Policy Statement.

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It is clear from the following program description that the STA (NOTA) is playing an active role in shift operations at Crystal River Unit 3, per the Policy Statement. This further description of the shift functions of the STA (NOTA) is provided in the current Administrative Instruction AI-702, "Conduct of Nuclear Safety and Reliability." At AI-702, 4.3.9, the instructions provide for the minimum activities of the STA (NOTA) while on shift.

4.3.9 ...

The principle function of the Shift Operations Technical Advisor (SOTA) is to provide diagnostic and remedial technical advice to the Nuclear Shift Supervisor (NSS) for the purpose of termination or mitigation of the consequences of off-normal operating events. The SOTA should perform the following activities during each 24-hour shift:

- 1. At the beginning of each SOTA shift, the oncoming and offgoing SOTAs should meet in the Control Room for proper turnover of information. The oncoming SOTA should then notify the NSS that he is on duty.
- 2. Attend the 0800 and 1600 shift turnover meetings.
- Maintain a SOTA log of noteworthy activities and/or special problems or concerns to be passed on to future SOTA shifts.
- Always ensure the capability of arriving in the Control Room within ten minutes of notification in order to give technical and analytical support to the operations group as requested by the NSS.
- 5. Make two tours of the plant, one on the 0800-1600 shift and the other on the 1600-2400 shift, noting any abnormalities concerning operations and/or safety. Such abnormalities should be reported to the NSS as required for appropriate action.
 - a. When making tours be aware of potential contamination or any other problems which may cause delay in reporting to the Control Room within ten minutes if requested.
- Review or observe any abnormal or unusual procedure or operation that is to occur during the SOTA's shift and advise the NSS on these as necessary.

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- 7. Give seminars, as required, to the shift personnel for the dissemination of operating experience information.
 - a. Limit these meetings to approximately 15 minutes (maximum of 30 minutes).
 - b. Provide proper documentation of personnel attendance.
- 8. Attend the daily plant coordination meeting.
- 9. Perform AI-1000 as required.
- 10. Perform Emergency Communications System Test as required.
- 11. Complete monthly transmittal of SOTA Operational Status Checklist as required.
- 12. Complete Enclosure 2 of this procedure and retain it in the Control Room.

If we can be of further assistance, or if there are questions on FPC's response or program descriptions, please contact this office.

Sincerely,

ElSempson

E. C. Simpson Director, Nuclear Operations Engineering & Licensing

cc: F. Rowsome, Human Factors Issue Branch Division of Human Factors Technology US Nuclear Regulatory Commission Washington, DC 20555

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