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April 25, 1985
 NRC/TMI-85-033

Docket No. 50-320

Mr. F. R. Standerfer
 Vice President/Director, TMI-2
 GPU Nuclear Corporation
 P. O. Box 480
 Middletown, PA 17057

Dear Mr. Standerfer:

Subject: Fuel Handling Senior Reactor Operator Training Program

On January 14, 1985, you forwarded the TMI-2 Fuel Handling Senior Reactor Operator (FHSRO) Training Program for NRC review and approval. We have identified areas where additional information is needed to complete our review and approval of your plan. Our specific comments are enclosed. Your prompt response will enable us to complete our action on this program as soon as possible. To facilitate this, we are available to discuss our comments at your earliest convenience.

Sincerely,

ORIGINAL SIGNED BY:
 William D. Travers
 William D. Travers
 Deputy Program Director
 TMI Program Office

Enclosure: As stated

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GPU Nuclear
TMI-2 Fuel Handling Senior Operator Training Program
Docket No. 50-320
Program Evaluation

Section 5.0 References

- ° There is no reference to 10 CFR Part 50. The licensee should review 10 CFR Part 50, particularly §50.54 which is applicable to senior operators and fuel handling. GPUN should include this reference in FHSRO training and applicable administrative procedures.
- ° The licensee should also include Appendix A of 10 CFR Part 55 as a reference document.
- ° The staff is aware that the licensee is developing safety analysis reports for the various defueling phases. These reports will contain information which provides the FHSRO many of the bases for design and safety for the defueling operations. The licensee should commit to using these analyses in appropriate lectures and in the on the job training (OJT).
Regulatory references for comments include §55.20 Scope of Examination.

Section 7.3 Objectives

The staff requests that Section 7.3.1 be changed to read: "The objectives of the program are to provide the FHSRO with applied knowledge of the principle of the nuclear power plant and applied knowledge and skills of fuel handling operations including:"

The reason for these additional skills in FHSRO training is that the fuel handling systems, tools and equipment (FHSTE) require actual "hands-on" training. The FHSRO should be able to demonstrate use of FHSTE as part of initial qualifications and licensing examination and be able to direct and evaluate others in use of FHSTE.

- ° There are no objectives which address the interface between the defueling task leader or any cognizant defueling engineers. Please provide objectives in this area.

The reason for additional objectives in these areas is to define responsibilities of the FHSRO and other defueling organization personnel.

Section 7.4 Objectives

The staff is aware that portions of the FHSTE are not yet developed, therefore, some operator training needs have yet to be identified. The staff is also aware that defueling is planned in various phases, each of which utilizes specific FHSTE.

The staff requests that GPUN describe what procedure or method will be utilized to identify operator training needs for initial and subsequent phases of defueling. For example the licensee should describe how safety evaluations, equipment design, procedural development and equipment limitations will be used to develop training plans.

The staff is aware that GPUN will certify prospective FHSROs prior to licensing for initial defueling. However, for subsequent defueling phases it is not clear to how the licensee intends to certify FHSROs. The training program should specifically state that the FHSROs and Fuel Handlers will be trained and determined to be qualified before the next defueling phase begins. Please describe how you intend to accomplish certification for subsequent defueling phases.

Section 8.0 FHSRO Requalification Training

The staff's review of Section 8.0 indicates that this program does not include all requirements contained in 10 CFR 55 Appendix A (example: there is no annual written examination). We request that the licensee review the requirements in Appendix A and include all applicable requirements. Please provide your reasons for omitting any section.

Additional Comments

- ° The staff's review documents included NUREG-0800 - Standard Review Plan, Section 13.2. Applicable references should be reviewed, particularly NUREG-0737 Item I.A.2.1 and applicable sections included in the program.

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