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June 10, 1985

TMI Program Office
Attn: Dr. W. D. Travers
Deputy Program Director
US Nuclear Regulatory Commission
c/o Three Mile Island Nuclear Station
Middletown, PA 17057

Dear Dr. Travers:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Fuel Handling Senior Reactor Operator Training

On January 14, 1985, the TMI-2 Fuel Handling Senior Reactor Operator (FHSRO) Training Program was submitted for your review and approval. By your letter, dated April 25, 1985, comments on the subject training program were provided and additional information was requested.

This letter responds to your specific requests for information. In addition, a revision to the FHSRO Training Program is attached which incorporates comments by the NRC staff and reflects other changes made due to the status of plant systems and operator responsibilities.

U.S. NUCLEAR
REGULATORY COMMISSION

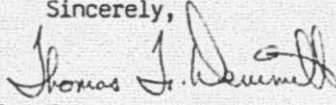
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If there are any questions regarding the responses or the revised training program, please contact Mr. Bruce Leonard, Operator Training Manager, at (717) 948-8046.

Sincerely,


F. R. Standerfer
for Vice President/Director, TMI-2

FRS/JCA/eml

Attachments

cc: Operator Licensing Branch - Division of Human Factors, Mr. B. A. Boger
Section Chief - Reactor Projects Section 1C, Mr. R. M. Keller
Regional Administrator - Offices of I&E, Dr. T. E. Murley
Program Director - TMI Program Office, Dr. B. J. Snyder

TMI-2 FUEL HANDLING SENIOR REACTOR OPERATOR TRAINING PROGRAM

In response to the program evaluation forwarded to GPUN regarding the Fuel Handling Senior Reactor Operator (FHSRO) Training Program, the following information is provided:

Section 5.0

- o 10 CFR Part 50 has been added as a reference to the FHSRO training program procedure.
- o 10 CFR Part 55 Appendix A also has been added as a reference.
- o The safety and technical evaluation reports developed for defueling systems and activities are currently being used in the development of training material. They are also included as references in the appropriate lessons plans.

Section 7.3

- o The objectives referenced in Section 7.3.1 have been revised to reflect the intent of the NRC comments.
- o An objective (item "n") has been added to address the interface between the FHSRO and the support organization personnel.

Section 7.4

- o The initial and continuing development of the FHSRO training program has followed the guidelines outlined in the Training and Education Department procedure "Training System Development Process", 6200-ADM-2682.01 (copy attached).
- o The certification of operators for initial NRC licensing will be in accordance with 4210-ADM-2610.01, "Requirements for Certification of Candidates for NRC Operator Licenses" (copy attached). Certification of qualification to commence subsequent phases of the defueling operation will require satisfactory completion of classroom and OJT training and examinations as addressed in Section 8.0.
- o The FHSRO training program is not intended to address the training requirements for the Fuel Handling Operators. The TMI-2 Control Room Operators will be trained and qualified as equipment and system operators in accordance with Procedure 6212-ADM-2611.01, "Licensed Operator Requalification Program - Unit 2". The TMI-2 Auxiliary Operators will be trained and qualified as equipment and system operators in accordance with Procedure 6212-ADM-2612.01, "Auxiliary Operator Training Program Unit 2". All individuals who are to manipulate defueling tools and equipment will receive hands-on skills training. This training will be developed by the TMI Training Department and will be conducted by the TMI-2 Site Operations and Recovery Operations Departments. The training will include practical exercises utilizing the Defueling Test Assembly (DTA) or other simulators, as necessary.

Section 8.0

The requalification program requirements for licensed operators, as addressed in 10 CFR 55 Appendix A, has been reviewed and applicable sections have been incorporated into the training program description in Section 8.0. The program has been revised to include requirements for a preplanned and operational lecture series, skills training, on-the-job training, annual examination and accelerated requalification training. The requirements established in 10 CFR 55 Appendix A have been included with the following exceptions;

1. Coverage of engineered safety systems in the lecture series.
2. Ten reactivity manipulations over the period of the license.

The deletion of coverage of engineered safety systems recognizes that the engineered safety systems have been disabled at TMI-2. In addition, the FHSRO has no responsibilities associated with engineered safety systems.

The characteristics of the defueling operations preclude the performance of the specific reactivity manipulations identified in 10 CFR Part 55 Appendix A, Section 3a. In lieu of this requirement, each licensed FHSRO will be required to perform reactivity manipulations specific to the defueling operation as detailed in Section 8.3.6 of the training program.

Additional Comments

The sections of NUREG-0737 relating to operator training have been reviewed for applicability. However, due to the unique condition of the TMI-2 reactor, none of these requirements are directly applicable.