

June 13, 2000

Mr. R. P. Powers
Senior Vice President
Nuclear Generation Group
American Electric Power Company
500 Circle Drive
Buchanan, MI 49107-1395

SUBJECT: D. C. COOK - NRC OPERATOR LICENSING REQUALIFICATION INSPECTION
REPORT 50-315/2000009(DRS); 50-316/2000009(DRS)

Dear Mr. Powers:

On February 15-18, May 8-12, and May 16, 2000, the NRC conducted the biennial inspection of the licensed operator requalification training program at your D. C. Cook, Units 1 and 2, Nuclear Power Station. The results of this inspection were discussed with Mr. Barry Wallace, Training Manager, and others of your staff on May 16, 2000. The enclosed report presents the results of this inspection.

This inspection was an examination of activities conducted under your license as they relate to safety and to compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations of activities, interviews with personnel, and observation of the administration of the annual requalification examinations. The inspectors determined that your staff appropriately administered the licensed operator requalification program.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room and will be available on the NRC Public Electronic Reading Room (PERR) link at the NRC home page, <http://www.nrc.gov/NRC/ADAMS/index.html>.

R. Powers

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We will gladly discuss any questions you have concerning this inspection.

Sincerely,

/RA/

John A. Grobe, Director
Division of Reactor Safety

Docket Nos. 50-315; 50-316
License Nos. DPR-58; DPR-74

Enclosures: 1. Inspection Report 50-315/2000009(DRS);
50-316/2000009(DRS)
2. List of Documents Reviewed
3. Simulation Facility Report

cc w/encls: A. C. Bakken III, Site Vice President
J. Pollock, Plant Manager
M. Rencheck, Vice President, Nuclear Engineering
R. Whale, Michigan Public Service Commission
Michigan Department of Environmental Quality
Emergency Management Division
MI Department of State Police
D. Lochbaum, Union of Concerned Scientists

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-315; 50-316
License Nos: DPR-58; DPR-74

Report No: 50-315/2000009(DRS); 50-316/2000009(DRS)

Licensee: American Electric Power Company

Facility: Donald C. Cook Nuclear Generating Plant

Location: 1 Cook Place
Bridgman, MI 49106

Dates: February 15-18, 2000 (Written Examination)
May 8-12, 2000 (Operating Examination)
May 16, 2000 (Exit Meeting)

Inspectors: H. Peterson, Senior Operations Inspector, Lead
A. Stone, Senior Operations Inspector (May 8-11, 2000)

Approved by: David E. Hills, Chief, Operations Branch
Division of Reactor Safety

EXECUTIVE SUMMARY

D. C. Cook, Units 1 and 2 NRC Inspection Report 50-315/2000009(DRS); 50-316/2000009(DRS)

This report covers the routine inspection of the licensed operator requalification training program. The inspection included a review of training administrative procedures and operating examination material; observation and evaluation of licensed operators and licensee evaluators during a requalification operating and written examinations; an assessment of simulator fidelity; an evaluation of program controls to assure a systems approach to training; and a review of requalification training records. The inspectors used the guidance in inspection procedure (IP) 71001, "Licensed Operator Requalification Program Evaluation."

Plant Operations

- The operating crew observed during the licensed operator requalification operating examination dynamic simulator scenarios performed satisfactorily. The individual performance weaknesses, including five written examination failures, were appropriately remediated prior to resumption of licensed duties (Section O4.1).

Operations Training

- The licensee's training and operations departments appropriately addressed licensed operator requalification training program weaknesses associated with operator human performance deficiencies noted in the plant, and continued to address issues affecting training program quality (Section O5.1).
- The licensed operator requalification examination material contained the necessary quantitative and qualitative attributes to provide an effective evaluation of operator skills (Section O5.2).
- The licensee satisfactorily administered the annual licensed operator requalification examinations according to program guidance and consistent with regulatory guidelines. Examination security was satisfactory (Section O5.3).
- The licensee's training department feedback system and self-assessment program were up to date and flexible enough to incorporate emerging training issues (Section O5.4).
- The licensee's current remedial training program contained adequate measures to ensure individual and crew performance weaknesses were identified and assigned. The licensee properly remediated and reexamined all operators who demonstrated knowledge and performance deficiencies prior to resumption of licensed duties (Section O5.5).
- The licensee implemented the training program for maintaining operator licenses in accordance with station procedures and applicable regulatory requirements (Section O5.6).

Report Details

I. Operations

O4 Operator Knowledge and Performance

O4.1 Annual Evaluation of Operator Performance (Operator Requalification)

a. Inspection Scope (71001)

The inspectors observed the performance of one operating crew during the annual licensed operator requalification operating examination. The operating crew which consisted of 14 licensed operators (six Senior Reactor Operators (SRO) and eight Reactor Operators (RO)) was divided into three simulator crews to facilitate the examination evaluation process. The operating examination consisted of two simulator scenarios on the plant specific simulation facility and five job performance measures (JPM). The inspectors also reviewed the results of all the licensed operators' biennial written examination. The inspectors' evaluation referenced the following procedures:

- NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Final Revision 8, April 1999.
- NRC Inspection Procedure 71001, "Licensed Operator Requalification Program Evaluation," July 1998.

b. Observations and Findings

Each simulator crew successfully completed each critical task as identified in the dynamic simulator scenarios. The licensee's evaluation team assigned a passing grade for all three crew's and individuals' performance during the dynamic simulator scenario portion of the annual requalification examination.

All licensed operators who took the JPM walkthrough examination, during the inspection period, successfully passed; however, the licensee evaluated the performances of two SROs and an RO on the same one JPM task as unsatisfactory. The JPM task was to calculate boric acid addition using a new procedure. Although all three operators overall passed the JPM walkthrough examination, the operators demonstrated weak use and understanding of the newly revised boron/dilution calculation procedure. The licensee appropriately remediated and reevaluated the three operators on the new procedure and on the common weakness prior to resumption of licensed duties.

All licensed operators who took the biennial written examination, with the exception of two SROs and three ROs, passed the examination. The licensee appropriately remediated the five operators on their weaknesses and reexamined them prior to resumption of licensed duties.

c. Conclusions

The operating crew observed during the licensed operator requalification operating examination dynamic simulator scenarios performed satisfactorily. The individual performance weaknesses, including five written examination failures, were appropriately remediated prior to resumption of licensed duties.

O5 Operator Training and Qualification

O5.1 Operating History

a. Inspection Scope (71001)

The inspectors reviewed the plant's operating history from August 1999 through May 2000, to assess whether the licensed operator requalification training program had addressed operator performance deficiencies noted in the plant. The inspectors discussed recent human performance issues with the NRC resident inspectors and licensee personnel, and reviewed the following documents:

- Licensee Event Reports for 1999 and 200,
- July 1999, Licensed Operator Requalification Inspection Report No. 50-315/316-99016(DRS),
- the current plant issues matrix and plant performance review (PPR) report; and
- selected NRC Inspection Reports.

b. Observations and Findings

The inspectors determined that weaknesses in the training program for licensed operators were identified through past NRC inspections. These weaknesses included the failure to adequately maintain the licensed operator requalification program within regulatory requirements concerning biennial medical examinations, maintenance of active operator licenses, and examination material security. During this inspection, the inspectors reviewed the licensee's corrective actions pertaining to the past identified weaknesses and found that the licensee had addressed and corrected the weaknesses.

The licensee had also appropriately addressed training program weaknesses associated with operator human performance deficiencies noted in the plant, and continued to address other issues affecting training program quality. For example, the licensee addressed excessive duplication of examination material during the annual examinations.

During this inspection, the inspectors noted improved and satisfactory operator performance while evaluating the dynamic simulator scenario examination. The inspectors also determined that the licensee's evaluators appropriately evaluated the licensed operators. The inspectors noted that the licensee's training program continued to show improvements.

c. Conclusions

The licensee's training and operations departments appropriately addressed licensed operator requalification training program weaknesses associated with operator human performance deficiencies noted in the plant, and continued to address issues affecting training program quality.

O5.2 Requalification Examinations

a. Inspection Scope (71001)

The inspectors reviewed the annual requalification examination material, which consisted of dynamic simulator scenarios, job performance measures, and written examinations to evaluate general quality, construction, and difficulty level. The inspectors assessed the examination material quality and content using inspection procedure 71001 checklists. The inspectors reviewed the methodology for developing the requalification examinations, including incorporation of probabilistic risk assessment insights. The inspectors compared both the current year and last year's annual requalification cycle examination material to assess the level of examination material duplication. The inspectors also discussed various aspects of the examination development with members of the licensee's training and operations staff.

Specific documents reviewed for this inspection are listed in Enclosure 2.

b. Observations and Findings

The licensee's requalification program for the operating examinations required that no more than 50 percent of the examination material will be repeated or duplicated from week-to-week. The examinations that were administered or planned to be administered each week during this requalification cycle were prepared such that no more than one simulator scenario was repeated from the first week to the third week, and no more than 40 percent (2 JPMs) of the JPMs in the walkthrough examination were repeated from week to week. Although the licensee met the program requirements of not exceeding the 50 percent week to week duplication, the licensee did not consider the aggregate of the complete six weeks examination cycle. By taking the aggregate of the six weeks of examination material already prepared for the annual examination cycle, the inspectors identified that the last two weeks of written examinations were 100 percent duplication from the first four weeks of written examination questions, and that the last two weeks of JPMs were 80 percent (4 out of 5 JPMs) duplicated from the first four weeks. Excessive duplication of examination material was a concern with respect to examination predictability.

The licensee subsequently enhanced the written and JPM examinations by adding new material. The written examination duplication percentage went from 100 percent to 46 percent, and JPM duplication was reduced to less than 50 percent. The inspectors reviewed the written examination results for all the licensed operators for the current

examination cycle and noted no indications of examination predictability. Two of the five written examination failures occurred in the last two weeks of the examination cycle indicating that the content of the administered examinations were not predicted by these individuals.

In general, the quality and level of difficulty of the examination material were considered satisfactory.

c. Conclusions

The licensed operator requalification examination material contained the necessary quantitative and qualitative attributes to provide an effective evaluation of operator skills.

O5.3 Requalification Examination Administration Practices

a. Inspection Scope (71001)

The inspectors performed the following to assess the licensee's policies and practices regarding requalification examination administration, simulator fidelity, and examination security:

- observed the performance of, and evaluated, one operating shift crew during the current annual requalification operating examination;
- observed both dynamic simulator scenario and JPM performance;
- observed the administration of the licensee's written examination for one crew;
- reviewed licensee's examination security practices; and
- observed and reviewed licensee's evaluator performance and documentation.

In addition to the above listed activities, specific documents reviewed for this inspection are listed in Enclosure 2.

b. Observations and Findings

The inspectors observed the licensee administer both the written and operating examinations during the annual licensed operator requalification examination. The inspectors observed one operating shift crew during the dynamic simulator scenarios and job performance measure evaluations, and another operating crew during the written examination. The inspectors observed six training staff personnel and three operations department management representatives administering the examinations. The observations included pre-examination briefings, observations of operator performance, individual and crew evaluations of observations, techniques for job performance measure cuing, and final evaluation briefing and documentation for fourteen licensed operators.

The inspectors reviewed all of the evaluation documentation for the overall crew performance and individual operator performance. The licensee identified minor operator performance weaknesses, which generally matched the inspectors'

assessments. The licensee also identified unsatisfactory performances by two SROs and one RO on one common JPM. All the operators for the one operating crew satisfactorily passed both the dynamic simulator and the JPM portions of the examination. The inspectors noted no undue prompting by the evaluators during the performance of the JPM walkthrough examination. Overall, the licensee's evaluators appropriately evaluated the operating crew and all individual operators.

In addition, the simulation facility operated satisfactorily. No simulator fidelity issues were identified during the inspectors' observation of the operating examination.

The inspectors reviewed the licensee's administration of the written examination to one operating crew. The crew was divided into two groups in order to administer the examination in two time periods, one examination in the morning and one in the afternoon. The same written examination was used. Therefore, to maintain proper security of the examination, the morning group was sequestered from the afternoon group. The licensee satisfactorily administered the written examination in accordance with program guidance. The examination room was appropriately setup, including separate reference material for each operator, to ensure proper examination security.

The inspectors reviewed the licensee's security measures throughout the examination with respect to both the written and operating examinations. The licensee appropriately maintained examination security.

c. Conclusions

The licensee satisfactorily administered the annual licensed operator requalification examinations according to program guidance and consistent with regulatory guidelines. Examination security was satisfactory.

O5.4 Requalification Training Program Feedback System

a. Inspection Scope (71001)

The inspectors verified the methods and effectiveness of the LORT program to ascertain whether assessments of operator performance were effectively incorporated into the requalification training. The inspectors performed interviews with key licensee personnel (operators, instructors, and training management) and reviewed the applicable licensee's procedures, feedback forms and recent operations department self-assessments. In addition, the inspectors performed a review of recent plant modifications for proper incorporation of operator training. Specific documents reviewed for this inspection are listed in Enclosure 2.

b. Observations and Findings

The licensee developed a new student feedback form in 1999. The new form included eight questions for the students to use to evaluate the course. The new form made it easier for the students to fill out, but also allowed for the students to make additional

comments, as needed. The licensee satisfactorily implemented the new feedback forms to make improvements in soliciting student feedback.

The inspectors noted in February 2000, that the licensee was heavily involved in maintaining control and coordination of recent plant modifications requiring training, or affecting the configuration of the simulator. Upon initial review of the training department records, not all of the available forms were being used for documenting and tracking identified plant modifications for required training. Most recently, during the May 8-12, 2000, inspection, a detailed review of 17 out of 172 restart modifications indicated satisfactory control and implementation of any and all required training.

The inspectors observed that the licensee's self-assessments were critical assessments. The Training Functional Area Assessment Report (99-RST-1999-001-TRN) dated September 29, 1999, identified several issues that required licensee management attention and corresponding good recommendations for continued improvement of the training program. Examples of issues identified in the licensee's report that required management attention included the following: (1) personnel training to improve qualification and experience level; (2) enhance station/industry operating experience and lessons learned; and (3) improve management involvement and oversight.

c. Conclusions

The licensee's training department feedback system and self-assessment program were up to date and flexible enough to incorporate emerging training issues.

O5.5 Remedial Training Program

a. Inspection Scope (71001)

The inspectors assessed the licensed operator requalification remedial training program, including reviews of program procedures and interviews with key staff members. The inspectors reviewed current requalification cycle remedial training packages for five individuals who failed portions of the written examination and for the three individuals who failed the one common JPM during the operating walkthrough test.

Specific documents reviewed for this inspection are listed in Enclosure 2.

b. Observations and Findings

The inspectors determined that the licensee's training program appropriately contained the requirements for the remediation process. Based on review of the current individual failures, five written examination failures, the operators were appropriately remediated and reexamined prior to resuming license duties. Concerning the three operators that demonstrated weaknesses on the one common JPM, the inspectors noted that the licensee had developed remedial training plans for these individuals and required successful completion of the remedial training prior to resuming license duties. The licensee's administration of the remedial training program and subsequent reexamination of operators was satisfactory. In general, the licensee properly identified

and corrected licensed operator performance deficiencies during this year's annual requalification examination evaluations.

c. Conclusions

The licensee's current remedial training program contained adequate measures to ensure individual and crew performance weaknesses were identified and assigned. The licensee properly remediated and reexamined all operators who demonstrated knowledge and performance deficiencies prior to resumption of licensed duties.

O5.6 Conformance With Operator License Conditions

a. Inspection Scope (71001)

The inspectors reviewed a sample of licensed operators' records to ascertain whether the facility and the operator licensees were maintaining license conditions in accordance with 10 CFR 55.53. In addition to the documents listed in Enclosure 2, the following records were reviewed:

- licensee's revised procedure and methodology for adequately maintaining licensed operator medical records,
- operator proficiency log records for 2000 which indicated the watch standing position and hours for licensed operators at the facility, and
- requalification training attendance records for this current cycle.

b. Observations and Findings

The inspectors reviewed the licensee's corrective actions concerning the program violations described in the July 1999 licensed operator requalification inspection report No. 50-315/316-99016(DRS). The program deficiencies included: (1) examination material left out unattended affecting examination material security as required by 10 CFR 55.49; (2) failure to implement the biennial medical examinations within the required time limits of 10 CFR 55.21; (3) failure to notify the NRC within 30 days of learning of the diagnoses of a medical condition not meeting requirements of 10 CFR 55.21; and (4) inactive licensed operator standing an active licensed control room organization shift position contrary to 10 CFR 55.53(e). The inspectors reviewed each licensee's condition report and verified proper implementation of the corrective actions. The inspectors reviewed all the procedure revisions associated with the violations, reviewed a sample of operator records and plant records, and observed the new computer tracking program implemented by the licensee. The inspectors determined that the licensee's corrective actions were satisfactory.

Based on the review of the current licensed operator records, the inspectors determined that the licensee satisfactorily maintained operator licenses in accordance with program guidance and regulatory requirements.

c. Conclusions

The licensee implemented the training program for maintaining operator licenses in accordance with station procedures and applicable regulatory requirements.

V. Management Meetings

X1 Exit Meeting Summary

The inspectors presented the inspection results to Mr. Barry Wallace, Training Manager, and other members of licensee management at the conclusion of the inspection on May 16, 2000. Mr. Wallace acknowledged the observations and findings and did not identify any information as proprietary.

PARTIAL LIST OF PERSONS CONTACTED

American Electric Power

R. Anderson, Operations Training Coordinator
R. Brown, Operations Training Manager
M. Barfelz, Regulatory Affairs
W. Nichols, Operations Continuing Training Supervisor
B. Wallace, Training Manager
L. Webber, Operations Manager

US Nuclear Regulatory Commission

B. Bartlett, Senior Resident Inspector
J. Maynen, Resident Inspector

INSPECTION PROCEDURES USED

IP 71001: Licensed Operator Requalification Program Evaluation

ITEMS OPENED, CLOSED, AND DISCUSSED

NONE

LIST OF ACRONYMS USED

DRS	Division of Reactor Safety
IP	Inspection Procedure
IR	Inspection Report
JPM	Job Performance Measure
LORT	Licensed Operator Requalification Training
NRC	Nuclear Regulatory Commission
PPR	Plant Performance Review
RO	Reactor Operator
SRO	Senior Reactor Operator

LIST OF DOCUMENTS REVIEWED

The following is a list of licensee documents reviewed during the inspection, including documents prepared by others for the licensee. Inclusion on this list does not imply that NRC inspectors reviewed the documents in their entirety, but, rather that selected sections or portions of the documents were evaluated as part of the overall inspection effort. NRC acceptance of the documents or any portion thereof is not implied.

Procedures:

- OHI-2070, "Operations Training and Qualification," Revision 13, July 8, 1999.
- Training Administrative Manual (TAM)-3.03, "Licensed Operator Requalification Training," Revision 24, January 11, 1999.
- TAM-3.03.05, "Operations Training Program Examination Requirements," Revision 11.
- OHP-2070, "Operations Training and Qualifications," Revision 13, Change Correction 5, Dated October 27, 1999.
- TI-TROP-01, "Operations Training (OPS) Operations Training Program Examination Requirements," Revision 0, December 1, 1999.
- TPD-600-LOR, "Licensed Operator Requalification Training Program Description," Revision 1, January 12, 2000.
- OHI-4023, "Abnormal/Emergency Operating Procedure User's Guide," Revision 6, November 3, 1998.
- E-0, "Reactor Trip or Safety Injection."
- E-3, "Steam Generator Tube Rupture."
- ECA-3.3, "Steam Generator Tube Rupture without Pressurizer Pressure Control."
- E-1, "Loss of Reactor or Secondary Coolant."
- FR-P.1, "Functional Restoration Procedure - Loss of Integrity."
- ES-1.3, "Transfer to Cold Leg Recirc."
- OHP 4022.002.009, "Leaking Pressurizer Power Operated Relief Valve."
- OHP 4022.002.020, "Excessive Reactor Coolant Leakage."
- OHP 4022.002.021, "Steam Generator Tube Leak."
- OHP 4022.013.009, "Pressurizer Pressure Instrument Malfunction."
- U-2 Technical Specifications.
- OHP 4021.005.001, "Boron Makeup System Operation," Revision 20.
- OHP 4022.055.003, "Loss of Condensate to Auxiliary Feedwater Pumps," Revision 5.
- OHP 4022.013.004, "Power Range Malfunction," Revision 4.
- ES-0.1, "Reactor Trip Response," Revision 13ac.
- OHP 4025.LS-6, "RCS Make-up, Seal Injection, and Boration with CVCS Cross-Tie," Revision 1.

Current Cycle Material:

- Six weeks of written examination material.
- Six weeks schedule for the proposed operating examination.
- One week of operating examination material, which included two Simulator Scenarios and five Job Performance Measures.
- Training Attendance Records.
- Upgrade/Remedial Training packages for individual failures for current cycle.

Assessments:

- Licensee's Quality Assurance audits for operations and training departments, including the Training Functional Area Assessment Report, Document No. 99-RST-1999-001-TRN, completed and dated September 29, 1999.
- March 23, 2000, Curriculum Review Committee notes regarding how to incorporate selected modifications into the training program.

Other Material:

- Two years training cycle plan.
- D.C. Cook Electronic Corrective Action Program, Condition Report No. P-99-15011.
- D.C. Cook Electronic Corrective Action Program, Condition Report No. P-99-21039.
- D.C. Cook Electronic Corrective Action Program, Condition Report No. P-99-18921.
- TIF (IMP 27), "Simulator Crew Evaluation Standards," documents for current examination cycle evaluations of operating crew.
- TIF (IMP 29A), "SRO Individual Simulator Performance Evaluations," documents for current examination cycle evaluations.
- TIF (IMP 29B), "RO Individual Simulator Performance Evaluations," documents for current examination cycle evaluations.
- TIF (IMP 29C), "STA Individual Simulator Performance Evaluations," documents for current examination cycle evaluations.
- TIF (IMP 29D), "Shift Manager Simulator Evaluation," documents for current examination cycle evaluations.
- TIF (IMP 29E), "JPM Summary," documents for current examination cycle evaluations.
- RQ-F-2510, "Read it for Restart - Design Changes."
- RQ-F-2511, "Read it for Restart - Procedure Changes, Operating Experience, and Miscellaneous Items."
- RQ-2483, "Operational Review, Year 24, Period 8."
- RQ-C-2491, "Design Change Review."
- RQ-R-2520, "Operations Review."
- RQ-C-2492, "Boron Reactivity Control and Changing to 4 Weight Percent Boric Acid Concentration."
- Unit 2 Restart List - listing and short description of restart modifications, selected 17 of 172 restart modifications for review.
- Training Action Tracking for the Simulator - listing and status of modifications for the simulator.

SIMULATION FACILITY REPORT

FACILITY LICENSEE: D. C. COOK

Facility Licensee Docket No.: 50-315; 50-316

Operating Tests Administered: May 8-12, 2000

This form is to be used only to report observations. These observations do not constitute audit or inspection findings and are not, without further verification and review, indicative of noncompliance with 10 CFR 55.45(b). These observations do not affect NRC certification or approval of the simulation facility other than to provide information that may be used in future evaluations. No licensee action is required in response to these observations.

While conducting the simulator portion of the operating tests, the following item was observed:

ITEM	DESCRIPTION
NONE	