



M. S. Tuckman
Executive Vice President
Nuclear Generation

October 31, 2000

Mr. David L. Meyer, Chief
Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop T-6 D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Comments on (Proposed) Additional Changes to NUREG-1021, "Operator Licensing Exam Standards" 65FR44080, dated July 7, 2000

Dear Mr. Meyer:

Duke Power Company offers the following comments relative to the solicitation for public comments regarding the (proposed) additional changes to NUREG-1021, "Operator Licensing Exam Standards."

Duke endorses the continued use of a random sampling process for the development of the examination outlines. This change to NUREG-1021 removes the time consuming and labor intensive burden of tracking the use of specific questions.

Duke joins with NEI in expressing concern regarding the following two (2) issues:

1. The treatment of the national exam question bank, maintained by the National Academy for Nuclear Training, as part of the facility examination bank, is unnecessarily restrictive. Due to the large size of the bank, these questions may be considered as new items if there is no basis for applicants to predict their use on the examination. The large size of the national examination question bank justifies this approach.

2. Difficulty will be experienced in adhering to the additional requirement that ten (10) of the questions in the generic

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Branch
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Duke Power Company
A Duke Energy Company

EC07H
526 South Church Street
P.O. Box 1006
Charlotte, NC 28201-1006

(704) 382-2200 OFFICE
(704) 382-4360 FAX

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U. S. Nuclear Regulatory Commission

October 31, 2000

Page 2

section of the written portion of the examination be "SRO Only." Typically, Reactor Operators and Senior Reactor Operators have the same learning objectives for many of the generic topics. As a result, it becomes very difficult to write "SRO Only" questions for these topics.

Duke endorses the industry response offered by NEI in their letter of October 30, 2000, pursuant to NUREG-1021.

Duke recognizes the efforts made by the NRC in the development of this guidance.

Please address any questions in this matter to Jeff Thomas at (704) 382-5826.

Thank you for the opportunity to provide these comments.

Very truly yours,



M. S. Tuckman

U. S. Nuclear Regulatory Commission

October 31, 2000

Page 3

bxc: M. T. Cash
L. E. Nicholson
G. D. Gilbert
C. J. Thomas
C. W. Sawyer
ELL