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Rules and Directives
Branch
USNRC

October 31, 2000

Chief, Rules and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments Concerning Draft Supplementary Changes to Revision 8 of NUREG-1021 "Operator Licensing Examination Standards for Power Reactors"

Dear Sir/Madam:

This letter is being submitted in response to Nuclear Regulatory Commission's request for comments concerning draft supplementary changes to NUREG-1021.

AmerGen and PECO Energy appreciate the opportunity to comment on the proposed NEI submittal on behalf of the industry concerning the draft supplementary changes to revision 8 of NUREG-1021. AmerGen and PECO Energy offer the following comments for consideration by the NRC:

Comments

ES-201 C.1.h on page 4 of 24
Implies that the future INPO bank questions should be treated as bank questions for all facilities. This is addressed more in ES-401 D.2.f. Treating the INPO bank as part of the facility bank detracts significantly from the anticipated advantages of having the INPO bank as a reference during examination development. The INPO bank was to have given facility exam writers the NRC's advantage of being able to use any question from anywhere without concern for the number of bank questions. Treating the INPO bank as part of the facility bank, subject to the same restrictions, devalues it as a tool.

ES-301
Changes made to the instrument/component failure requirements in response to industry feedback will be a benefit.

The other industry suggestions and comments still have not been addressed by this revision. In particular, the administrative section of the exam is adequately covered on the written exam and should be eliminated from the operating examination. Also, on this section of the exam it is recommended that administrative tasks be tested using job performance measures (JPMs) and yet the examples are oriented toward questions, not JPMs. Extensive industry feedback was provided to the NRC on this topic at the NRC Region 1 examiner conference held August 17-18, 1999.

ER105-03

Template - ADM 013

David Trimble
Siegfried Guenther

ES-401 C.1.f and Form ES-401-7

Addresses how the utility must document that the NRC exam integrity was not compromised by the contents of the audit exam. There are three bulleted examples of acceptable practices. It is significant to note that this was never an issue when the NRC developed their own exams, so the concern must be strictly with preserving the integrity of the NRC examination with facility authors. The most simple and direct method of addressing this concern is not listed as one of the acceptable methods. It would be to have a separate team not on the NRC exam security develop the audit exam. This method allows no intentional overlap between the audit and NRC exam. Any overlap that could occur would be random. The use of a separate team, not on NRC exam security appears to be the best method, but is not endorsed by the NRC as one of the examples. This example should also be added to Form ES-401-7.

ES-401 D.1.b page 3 of 45

This section relates to the creation of the written exam outline. In the second paragraph, it is explained that the generic knowledge and abilities (K/As) which are selected with systems should only be used if they are appropriate to the system. This situation should be added as an example of K/As which may be rejected, which is located in the beginning of the third paragraph. Exactly what type of documentation needs to be maintained for rejected K/As is not clear. For example, do all changes to the initial random generation need to be justified or just those that are not part of the examples listed? Consideration should be made to generating a table for documentation of rejected K/As, the reasons they were rejected, and the K/As that replaced them. Excessive documentation of obvious mismatches between generic K/As and systems where they do not fit seems to be an inappropriate use of time.

ES-401 D.1.c & D.2.d

It should be clearly stated that "SRO" questions are any questions written to the K/As that NUREG-1123 links to 10CFR55.43. In all of NUREG-1123, out of approximately 6000 K/As only 50 are SRO only. This means they are linked only to 10CFR55.43 and not 10CFR55.41. All of the K/As linked to 10CFR55.43 are in the generic section. Since most SRO K/As also apply to ROs, it is extremely challenging to write questions from the K/As that only apply to SROs. Many facilities do not have "SRO Only" objectives, since they train their ROs to the SRO level in the classroom setting.

The new requirement for at least ten of the SRO-only questions to appear in Tier 3 seems unnecessary. It does not add to the validity of the exam and provides additional challenges to the facility exam writers since the software the industry developed to generate the required random, but systematic exam outlines, is not designed for this new requirement. The software can be updated if this requirement is adopted.

The statement regarding the distribution of 15 additional SRO questions is confusing. It states that the remaining SRO-only questions should be "about evenly distributed among the "(E)A2" (Emergency Ability 2) and "G" (Generic) categories in Tier 1 and Tier 2." Does it mean to distribute evenly between the "(E)A2" and "G" categories, or evenly between the two Tiers? It is also important to note that "(A)A2" (Abnormal Ability 2) K/As are designated in NUREG-1123 as meeting 10CFR55.43 but are not mentioned in the examples in this section.

The more requirements placed on the exam outline distribution, the more predictable and less random it becomes.

ES-401 D.2.f page 5 of 45

Does not specify what controls to take if several comprehensive exams are given near the end of the course (i.e., pre-audit exams, and practice NRC exams) with only one as the actual "audit exam." Do all large comprehensive exams count as audit exams or only the one the utility designates as the audit exam?

Once again, the INPO bank could have provided a significant advantage to the facilities when writing their own exams. This section directs licensees to consider the INPO exam bank as part of their own exam bank which removes the advantage of having the INPO bank.

ES-401 Form ES-401-9

This form requires the NRC to evaluate the difficulty of questions on a scale of 1 to 5. If the question is a 1 or 5, it is unsatisfactory, yet there is no explanation of what constitutes a level 1 or 5 question. This scaling of difficulty of the question is subjective, and may be difficult to predict.

ES-403 C.1.a page 1 of 5

This step should contain the requirement to make a copy of the answer keys before the grading is complete. This is required on the examination grading quality check list (ES-403-1), but is not contained in the body of the step which is completed before filling out the quality check list.

If you have any questions, please do not hesitate to contact us.

Very truly yours,



James A. Hutton, Jr.
Director - Licensing