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October 31, 2000

Rules and Directives Branch  
 Division of Administrative Services  
 Office of Administration  
 U. S. Nuclear Regulatory Commission  
 Washington, D.C. 20555-0001

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

**References:** (1) Volume 65, Federal Register, Page 44080 (65 FR 44080), dated July 17, 2000

(2) Nuclear Energy Institute letter, "Comments on Draft Supplementary Changes to Revision 8 of NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," dated October 30, 2000

Commonwealth Edison (ComEd) Company appreciates the opportunity to comment on the draft supplementary changes to Revision 8 of NUREG-1021, "Operator Licensing Examination Standards for Power Reactors." This letter provides ComEd's comments in response to Reference 1. ComEd has been actively involved with the Nuclear Energy Institute (NEI) on this issue and endorses the industry comments submitted by the NEI in Reference 2.

In addition to the comments provided by the NEI, we have the following specific comment regarding Section ES-401, "Preparing Initial Site-specific Written Examinations." Section C.1.f of ES-401 provides three examples of acceptable control measures to ensure that duplication from the comprehensive audit or screening examination will not compromise the integrity of the licensing examination.

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Examples of acceptable control measures are as follows.

- The facility licensee could prepare the audit examination using a systematic and random sampling process that is similar to that used to prepare the NRC licensing examination as discussed in Section D; or
- the facility licensee could prepare and finalize the audit examination before it begins developing the NRC licensing examination outline as discussed in Section D; or
- the facility licensee could certify as part of the examination submittal that there is no question duplication between the facility licensee's audit examination and the NRC licensing examination.

While these are provided as examples, Form ES-401-7, "Written Examination Quality Checklist," Item 4, lists these three examples as the only acceptable means to ensure examination integrity is maintained for facility developed examinations in that one must be checked when completing the checklist. The examiner standards should be revised to allow other means of examination overlap control to be implemented.

Possible solutions include:

- The checklist could be revised to allow "other" to be checked in Item 4 and that item explained as part of the examination submittal. This would allow the "examples" intent of Section C.1.f in ES-401 to be implemented.
- ES-401, Section C.1.f and Form ES-401-7 could be revised to allow the audit examination to be written or revised by personnel that would not be on the NRC examination security agreement. Also, any of those who authored the audit examination would not be allowed to do additional work on the audit examination once they signed the NRC examination security agreement. This would ensure that the audit examination would not be revised by personnel knowledgeable of the NRC examination outline and should ensure no examination compromise.

If you have any questions about this letter, please contact K. A. Ainger at (630) 663-7350.

Respectfully,



R. M. Krich  
Director – Licensing