July 10, 2002

MEMORANDUM TO: Bruce A. Boger, Director
Division of Inspection Program Management
Office of Nuclear Reactor Regulation
/RA by Roy Caniano Acting For/

FROM: John A. Grobe, Director
Division of Reactor Safety

SUBJECT: NRC REGION III FY-2002 OPERATOR LICENSING SELF-ASSESSMENT

I am attaching our recently completed Region III FY-2002 operator licensing self-assessment for your information and staff review (Attachment 1). We believe this self-assessment provides an accurate characterization of Operations Branch (OB) performance in Region III and serves as a good indicator of the branch's effectiveness in maintaining an atmosphere of continuous improvement through training, self-critical reviews, and frequent feedback on performance. The self-assessment revealed that the performance of the Region III OB remained at a high level throughout the assessment period. The OB continued to conduct technically accurate and balanced licensed operator examinations and made appropriate and defendable licensing decisions.

The self-assessment identified some opportunities for continued improvement. In particular, my examiners believed that continued attention is necessary in the area of consistency in review of licensee submitted examination material. This issue was previously identified in the Region III FY-2001 Operator Licensing Self-Assessment as an area needing improvement. Branch training and discussions concerning examination review consistency including concepts such as questions matching referenced knowledge and ability (K/A) statements or what constitutes a "senior reactor operator (SRO) only" question were subsequently provided. Despite some resulting improvement, I believe that additional focus in these areas will help with overall branch understanding of the concepts and ensure they are being consistently applied during examination reviews.

CONTACT: Dave Pelton, DRS
630-829-9732

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We have developed a FY-2002 Region III Operator Licensing Plan For Excellence (Attachment 2). For your reference, we are also including a copy of our recently completed FY-2001 Region III Operator Licensing Plan For Excellence (Attachment 3). As noted in the attached self-assessment, the Plan For Excellence has proven to be an excellent tool for ensuring corrective actions identified by assessment activities (both internal and external) are tracked through completion.

We have completed our review of your staff's recent Operator Licensing Office Audit. We appreciated the positive feedback provided in the areas of Resource Utilization and Licensing Assistant Activities. We also acknowledge that the audit identified findings that represented opportunities for improvement. In general, the findings echoed issues we had identified during our Fiscal Year 2002 Operator Licensing Self-Assessment. We have incorporated the findings from your staff's Audit into our Fiscal Year 2002 Plan For Excellence. I am available at your convenience should you have any questions regarding our self-assessment or OB performance in Region III.

Attachments:
1. NRC Region III FY-2002 Operator Licensing Self-Assessment
2. Fiscal Year 2002 Region III Operator Licensing Plan For Excellence
3. Fiscal Year 2001 Region III Operator Licensing Plan For Excellence

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June 20, 2002

MEMORANDUM TO: John A. Grobe, Director
Division of Reactor Safety

THRU: David E. Hills, Chief ***/RA/***
Operations Branch

FROM: David L. Pelton, Senior Operations Engineer
Mary Ann Bies, Licensing Assistant
Bruce B. Palagi, Operations Engineer
Phillip T. Young, Operations Engineer

SUBJECT: NRC REGION III FY-2002 OPERATOR LICENSING SELF-ASSESSMENT

During February and March 2002, Region III examiners assessed the administration of the operator licensing process in Region III. The review covered Region III operator licensing activities during the period from March 31, 2001, through March 31, 2002.

The auditors assessed the overall effectiveness of the Region's operator licensing process and it's adherence to the guidance contained in NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," and other policy documents. The auditors conducted the review in accordance with an Operations Branch (OB) Branch Chief approved assessment plan (developed by the auditors) and in accordance with selected portions of Operator Licensing Manual Chapter (MC) 310, "Annual Office Visit Procedure." The performance of this self-assessment helps support the branch's goal of maintaining an atmosphere of continuous improvement through training, self-critical reviews, and frequent feedback on performance. This self-assessment focused on the status of branch commitments made as a result of previous assessment activities (both internal and external), the effectiveness of actions taken to address previous branch commitments, and on addressing potential areas for improvement identified through discussions with Region III OB personnel and review of examination/inspection material.

Performance of the Region III OB remained at a high level. Commitments made by the branch in response to previous assessment activities were, for the most part, completed. The development of the branch's "Plan For Excellence" helped to ensure corrective actions identified by assessment activities (both internal and external) were tracked through completion. Initial license examination failure rates during this assessment period declined significantly compared to previous years. This is due, in part, to the increased emphasis the branch placed on ensuring the facility licensees understood the NRC's expectations concerning the quality and preparedness of the applicant's being presented for license examinations. The branch continues it's trend of no appeals of license denials. As discussed in previous assessments,

the branch's success in this area can be largely attributed to the quality of documentation, the quality of peer reviews, and continued open discussions with facility licensees. As always, the ability to make appropriate licensing decisions, in particular, indicates exemplary support of the NRC performance goals of maintaining safety and increasing efficiency and effectiveness.

All operating plan metrics, during the assessment period, were met. The OB continued to effectively meet program objectives by administering all scheduled examinations and baseline inspection. This was particularly note worthy considering recent significant personnel changes within the branch and considering the additional workload that resulted from the NRC's response to the events of September 11, 2001.

Two areas represent opportunities for continued improvement (both areas were previously identified as opportunities for continuing improvement in the Fiscal Year 2001 Self-Assessment of the Operator Licensing Process):

- **Consistency with the review of initial license examinations**: Although the branch has made great strides regarding the quality of examination reviews in recent years, continued attention appears warranted. In the area of written examination reviews, psychometric examination concepts (i.e., questions not matching associated knowledge and ability statements (K/As), questions having multiple correct answers, questions not written at the appropriate level; either reactor operator or senior reactor operator, etc.) are not consistently understood by examiners or applied during chief examiner reviews of examination material. In the area of operating test reviews, ensuring alternate paths selected for job performance measures (JPMs) meet the requirements of NUREG-1021, Appendix C and ensuring there is consequence to an applicant's failing to perform a "critical step" are areas also not consistently understood and applied during reviews of examination material. In addition, the auditors identified that although branch training and discussions concerning the above concepts had been provided, the amount of time spent covering these issues was limited. Although these areas are somewhat subjective, additional focus will help with overall branch understanding of the concepts and ensure they are being consistency applied during examination reviews.

- **Communications with facility licensees**: The branch continues to maintain open, effective communications with the facility licensees. Efforts implemented previously continue to ensure appeals are avoided and scheduling issues are resolved in a timely manner. However, based on discussions with licensee personnel, it appears that licensee examination developers struggle with the same concepts as are mentioned in the bullet above. Licensee examination developers frequently look to NRC examiners for additional guidance. Guidance provided from chief examiner-to-chief examiner is not always consistent. The auditors believe that through continued open communications, we can further enhance the licensee's understanding of these issues. However, this effort must start at "home" by first addressing the branch's needs (as discussed above) in order that we might better address these issues with the licensee.

The auditors concluded that the Region III OB continues to perform at a high level. The auditors are also confident that the branch's performance in the above areas will improve through increased focus, discussion, and training. If you have any questions, we are available at your convenience.

Attachments: (1) NRC Region III FY-2002 Operator Licensing Self-Assessment.
(2) Review of Selected Year 2001 Completed Examination Packages.

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Attachment 1

NRC Region III FY-2002 Operator Licensing Self-Assessment

1. The Status of Branch Commitments Made as a Result of Previous Assessment Activities:

The auditors performed an extensive document review in an effort to ensure commitments made as a result of previous assessment activities had been addressed, tracked, and closed in a timely manner. Documents reviewed included:

- Current and previous Region III Operator Licensing Plan For Excellence.
- The 1999 Region III Operator Licensing Self-Assessment.
- The 2000 Follow-Up to Self-Assessment Results of the Operator Licensing Program in Region III.
- The 2001 Region III Operator Licensing Self-Assessment.
- DRS Divisional Instruction DI-0001, "Examiner Expectations."
- Region III Operator Licensing Examination Emphasis Document.
- 2000 Annual Review of the Operator Licensing Program in Region III (HQ).
- 1999 Audit of the Fermi Initial License Examination (HQ).
- 2000 Audit of the Kewaunee Initial License Examination (HQ).
- 2001 Audit of the Fermi Initial License Examination (HQ).

The auditors determined that, in general, branch commitments made were either completed or were being tracked via the Region III Operator Licensing Plan For Excellence. The auditors considered this an exemplary effort considering the number of commitments and actions discussed or assigned in the above list of documents.

The auditors determined that although the Region III Plan For Excellence is an excellent tool for tracking corrective actions or other open items, it does not include date of entry information; therefore, determining overall timeliness of completion is difficult to ascertain. The auditors identified one assignment, "Development of a List of Inconsistencies and Proposed Solutions," that had only recently been completed; however, it was entered into the Plan For Excellence July of 2001. Discussions with the Operations Branch (OB) Branch Chief indicated that the assignment had been intentionally delayed due to competing priorities. Because the identification and correction of exam inconsistencies continues to challenge the branch (as is discussed in Section 2 of this report), timely completion of this assignment could have helped address many of the comments generated by the auditors during their review of examination material.

The auditors also noted that the results of a commitment contained in the 2000 Annual Review of the Operator Licensing Program in Region III (HQ) had not been communicated to Headquarters staff. Headquarters staff recently contacted Region III and inquired as to the results of a review that the branch had committed to perform regarding conclusions drawn on post-examination comments on a 1999 Palisades written examination. The branch had concluded that there were two questions on the 1999 Palisades written examination for which multiple answers should be accepted. The Headquarters staff questioned whether multiple answers should have been

accepted believing instead that the questions should have been deleted from the examination. The concern voiced by Headquarters staff was that if the questions were deleted then pass/fail decisions could have been impacted. At that time, the OB re-reviewed the question resolutions and attendant examination results and determined that even if the questions had been deleted, this action would have had no impact on pass/fail decisions. However, this resolution was not communicated to Headquarters.

2/3. The Effectiveness of Actions Taken to Address Previous Branch Commitments and Determining Potential Areas for Improvement:

The auditors assessed the overall effectiveness of the Region's operator licensing process and it's adherence to the guidance contained in NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," and other policy documents. The assessment covered the Region III operator licensing activities during the period from March 31, 2001, through March 31, 2002. The auditors conducted the review in accordance with an OB Branch Chief approved assessment plan (developed by the auditors) and in accordance with selected portions of Operator Licensing Manual Chapter (MC) 310, "Annual Office Visit Procedure." This portion of the self-assessment focused on the effectiveness of actions taken to address previous branch commitments and on addressing potential areas for improvement identified through discussions with Region III OB personnel, review of examination/inspection material, and review of the results of previous assessment activities (both internal and external). The auditors reviewed one examination package submitted by each qualified chief examiner (a total of four) during the assessment period.

The following documents the results of assessment activities, breaking the program down into sections as discussed in MC 310:

Examination and Inspection Administrative Requirements:

The examination and inspection administrative requirements assessment was completed in conjunction with the review of examination packages. The auditors reviewed examination and inspection reports generated during the assessment period. Examination reports reviewed included the 2001 Braidwood examination, the 2001 Clinton examination, the 2001 D. C. Cook examination, and the 2001 Palisades examination. Additionally, the auditors reviewed four requalification inspection reports generated in 2001 including the 2001 Kewaunee inspection, the 2001 Fermi inspection, the 2001 Quad Cities inspection, and the 2001 LaSalle inspection. Notable observations included:

- All examination results and examination/inspection reports were issued in accordance with the requirements of NUREG-1021 and the Region III Operator Licensing Examination Emphasis Document with only two exceptions: 1) the results of the 2001 Braidwood examination were issued in 35 days verses the branch goal of 30 days. This was due to additional time taken by the Braidwood

and Byron chief examiners to resolve 10 post-examination comments and 2) the inspection input for a Quad Cities licensed operator requalification inspection was provided to Division of Reactor Projects (DRP) personnel in 45 days verses the goal of 21 days. This was due to the additional time required to research and resolve an issue wherein the licensee had failed to follow their requalification examination procedures. The issue could not be evaluated using MC 0609, "Significance Determination Process," thus, resolution of the issue required reviews by NRR, OE, and Region III EICS.

- The auditors determined that inspection and examination reports were written using the required formats delineated in MC 0610* "Power Reactor Inspection Reports," NUREG-1021, and the Region III Operator Licensing Examination Emphasis Document. When required, statements of examination quality were appropriately included. Also, violations observed during inspections were documented in accordance with MC 0610* and the NUREG/BR-0195, "Enforcement Manual" and appropriately characterized in accordance with MC 0609, Appendix I.

- The auditors determined that the four examination packages reviewed were complete (following the branch's Examination Retention Checklist) and had been entered into ADAMs. The timely entering of examination packages into ADAMs had been previously identified as a weakness based on the backlog of exams awaiting entry. Currently, there is no backlog of material awaiting entry into ADAMs. Successes in this area are primarily due to the perseverence and attention to detail exhibited by the licensing assistant.

Written Examinations:

The written examination assessment was performed by reviewing a sample of 30 written questions from each of four examinations (2001 Braidwood examination, 2001 Clinton examination, 2001 D. C. Cook examination, and 2001 Palisades examination). Included in this sample was a sub-sample of at least 10 "senior reactor operator (SRO) only" questions from each examination. The examination material was evaluated against the requirements of NUREG-1021, ES-401. Additionally, this portion of the assessment focused on the branch's ability to ensure written examination questions matched the associated knowledge and ability statements (K/As), to ensure questions did not have multiple correct answers, and to ensure questions tested the applicants at the appropriate level of knowledge (either reactor operator (RO) or SRO). These focus areas were selected based on comments received during previous Headquarters audits and assessments and based on interviews with Region III examiners. Notable observations included:

- In the past, emphasis had been placed on the quality of reviews performed on submitted examination material. In general, this focus was successful in improving the overall quality of reviews performed. Of particular note, a 2002

Headquarters review of the 2000 Kewaunee initial licencing examination package indicated that "The [review of the] examination was notable for the exacting quality of the pre-examination review process conducted for the facility licensee's proposed written examination and operating test." The report went on to state that "The chief examiner and examination team's efforts were exemplary and resulted in the identification of many potential test item deficiencies." However, additional attention in this area appears to be warranted. Based on the review performed for this assessment, the auditors identified that of the 30 questions reviewed from each exam, an average of 14 questions per exam, did not appear to meet the requirements of NUREG-1021. The branch's ability to identify non-compliance with the concepts discussed above (particularly the concept of ensuring questions match associated K/As) continued to be challenged. In addition, the auditors identified that although branch training and discussions concerning the above concepts had been provided, the amount of time spent covering these issues was limited. Although these areas are somewhat objective, additional focus and open discussion would help with overall branch understanding of the concepts and ensure they are being consistency applied during examination reviews. The auditors recognize that scheduling additional training and discussion times will be particularly challenging considering the amount of time examiners generally spend on the road. As previously noted in Section 1 of this assessment, the branch is working on the development of a list of examiner inconsistencies and proposed solutions. This list, once issued, will help the branch to focus on these issues and in the development of associated training.

- The auditors reviewed written examination comments documented on the ES-401-9 forms. The thorough documentation of comments and their resolution has been an area identified in previous audits and assessments as needing additional attention. The auditors noted that each examination package included a completed ES-401-9 form and that comments generated were generally of high quality. The quality of the documentation made it possible for the auditors to understand the comments, understand the basis of the comments, and understand whether or not questions were satisfactory, needed some enhancements, or were unsatisfactory.

- Documentation of post-examination comments, in general, continued to improve compared to previous assessments. The branch dedicated additional time and resources to this effort including a recent audit to ensure comments are throughly addressed and consistently answered. Additionally, training was provided on the results of this audit. Although general improvements continue, the auditors identified two recent examples of post-examination comment write-ups that did not appear to support the conclusions drawn regarding whether or not to accept multiple correct answers to the associated written examination questions. The branch should continue to focus on post-examination decisions since they frequently support pass/fail decisions.

- The numbers of post-examination comments can often be an indicator of the quality of examination material as discussed in NUREG-1021, ES-501 (i.e., 5% and 10% thresholds for numbers of post-examination comments). As such, the relatively high number of post-examination comments on Byron and Braidwood written examinations (nine and ten respectively) supported an earlier conclusion that additional focus on examiner reviews of as-submitted examination material is warranted. Although the facility licensee is ultimately responsible for the overall quality of "as-submitted" examination material, the examiners are expected to perform a review of sufficient detail as to identify and correct issues prior to examination administration.

Operating Tests:

The operating test assessment was performed using the same four examinations used during the written examination assessment. The auditors reviewed all job performance measures (JPMs) (administrative, simulator, and walk-through) as well as the dynamic simulator scenarios operating test material and evaluated them against the requirements of NUREG-1021, ES-301. Notable observations include:

- In the past, emphasis had been placed on the quality of reviews performed on submitted examination material. In general, the focus has been successful in improving the overall quality of reviews performed. However, additional attention in this area appeared to be warranted. Based on the review performed for this assessment, the auditors identified that the branch's ability to identifying non-compliance with concepts such as ensuring alternate paths selected for job performance measures meet the requirements of NUREG-1021, Appendix C and ensuring there is consequence to an applicant's failing to perform a "critical step" continues to be challenged. In addition, the auditors identified that although branch training and discussions concerning the above concepts had been provided, the amount of time spent covering these issues was limited. As with the written exam concepts, these areas are somewhat objective. Additional focus and open discussion will help with overall branch understanding of the concepts and ensure they are being consistently applied during examination reviews. The auditors recognize that scheduling additional training and discussion times will be particularly challenging considering the amount of time examiners generally spend on the road.

- Operating test documentation was generally of high quality with clear and defendable rationale for failures. However, some documentation inconsistencies were identified during this assessment. For example, a comment was generated on an applicant's performance on a JPM, however, the write-up did not include a statement as to whether the applicant had performed satisfactorily or not; an applicant was given a grade of unsatisfactory on a JPM although he had self-identified his mistakes, corrected them, and completed the task; and an applicant

was graded as “1" on a simulator scenario competency based on a culmination of errors that individually were considered non safety-significant. Although the above examples did not impact pass/fail decisions, they do indicate the need to maintain a heightened level of awareness concerning the consistency with which the branch documents examination and test results.

Operator Requalification Program:

The operator requalification program assessment evaluated adherence to administrative controls and procedures as well as the conduct of requalification program inspections. A total of four inspection report inputs were reviewed (2001 inspections conducted at Kewaunee, Fermi, Quad Cities, and LaSalle). Notable observations included:

- The auditors determined that the inspections appeared to be conducted in accordance with Inspection Procedure 71111.11, “Licensed Operator Requalification Program.” The auditors also determined that inspection report inputs were of high quality and prepared in accordance with MC 0610*. The auditors determined that identified violations of NRC requirements were documented in accordance with MC 0610* and the NUREG/BR-0195, “Enforcement Manual” and appropriately characterized in accordance with MC 0609, “Significance Determination Process, Appendix I.

- The branch identified a number of issues and violations related to the licensee’s requalification programs. These included green findings related to individual performance on requalification examinations and violations relating to the reporting of medical conditions, record retention, and a failure to follow program requirements. Identification of these issues helped to strengthen the licensee’s programs and ensured that licensed operators continued to meet all applicable requirements of 10 CFR 55.

- The auditors determined that with only one exception, all inspection report inputs were incorporated into associated integrated inspection reports. The only exception involved an input for a Dresden inspection report. The branch had prepared, reviewed, and approved the input and had forwarded the input to Division of Reactor Projects (DRP) personnel for incorporation into an integrated inspection report. However, the input was overlooked by DRP personnel during assembly of the report. This issue has been discussed with DRP personnel.

- Three unresolved items, noted in previous assessments as having been open for greater than six months, were recently reviewed and closed. Although the auditors acknowledge the effort the branch put forward to close these items, continued attention to timely resolution of open items is warranted.

- The auditors noted that inspection planners generated during this assessment period had been forwarded to the branch secretary for retention. Eight planners

out of a total of nine inspections performed had been forwarded. This represented a significant improvement over previous assessments.

Regional Operations:

The regional operations assessment reviewed the communication interface between the Region and Headquarters staff. Also considered was the branch's interface with the Region's facility licensees regarding the operator licensing process, the Region's methods of disseminating program office guidance, scheduling examinations, and the processing of license denials. Notable observations include:

- The auditors determined that the branch continues to maintain open, effective communications with the facility licensees. Efforts implemented as a result of previous assessment activities continued to ensure appeals are avoided and scheduling issues are resolved in a timely manner. However, based on discussions with licensee personnel, it appeared that licensee examination developers struggle with the same concepts as are discussed in the Written Examination and Operating Test assessment sections of this report. Licensee examination developers frequently looked to NRC examiners for additional guidance. Guidance provided from chief examiner-to-chief examiner was not always consistent. The auditors believe that through continued open communications, the branch can further enhance the licensee's understanding of these issues. However, this effort must start at "home" by first addressing the branch's needs (as previously discussed in this report) in order that we might better address these issues with the licensee.

- The branch's participation in Mid-West Nuclear Training Association (MNTA) meetings continued throughout the assessment period. The branch participated in a quarterly MNTA regional meeting in July of 2002 and participated in the 2002 annual MNTA meeting in October of 2002. Participation at each MNTA quarterly meeting and annual meeting continues to be a goal of the branch. Because of staffing commitments, the branch was unable to attend a February MNTA meeting but will strive to ensure examiner availability for future meetings. The branch also participated in meetings with the Nuclear Energy Institute operator licensing focus group and internal Agency operator licensing counterparts meetings in Headquarters.

- The auditors noted continued open communications between the branch and Headquarters staff. Maintaining communications with Headquarters helps ensure program consistency. The auditors noted that examiners frequently contacted Headquarters staff to discuss NUREG-1021 requirements regarding license applicant waivers, licence applicant training and qualifications, and examination results documentation and to solicit assistance while characterizing potential violations. The auditors also noted that the Operator Licensing Branch Chiefs continue to participate in bi-weekly meetings, which include Headquarters

participation. These meetings also help instill consistency by encouraging open and frank discussions on current operator licensing issues.

- During the assessment period, Region III denied three applications for license based on operating test and/or written examination failures. This is a significant reduction in number from last year. This reduction appears to be due to: 1) the increased emphasis the branch has placed on ensuring the facility licensees understand the NRC's expectations concerning the quality and preparedness of the applicant's being put up for license examinations, 2) an increase in the number of applicant's dropped from NRC examinations due to unsatisfactory performance on licensee audit examinations, and 3) on an over-all reduction in the number of individuals examined during the assessment period.

- The auditors noted that the branch continues to schedule and plan examination and inspections well in advance, minimizing scheduling impacts on both the region and the licensees. The auditors determined that successes in this area appeared to be largely due to the diligence with which the OB Branch Chief managed the schedule. The Branch Chief also frequently encouraged the branch to review examination and inspection dates with facility licensees to ensure scheduled dates were accurate and to detect and resolve unforseen schedule conflicts in a timely manner. In addition, the branch revised its scheduling methodology in order to increase schedule flexibility and to provide for a more efficient use of resources. Also contributing to the branch's successes in this area was the effective use of examiner-qualified resident inspectors (two) to assist with the examination process. The branch schedule continues to reflect the future participation of these individuals on examinations. The branch's ability to meet all scheduled examination and inspection commitments was particularly noteworthy considering recent significant personnel changes within the branch and considering the additional workload that resulted from the NRC's response to the events of September 11, 2001.

<u>Licensing Assistant Activities</u>:

Although the licensing assistant activities were not specifically assessed, the auditors were able to make a number of observations while assessing other areas:

- The auditors noted that the overall high quality of the examination packages, maintained by the licensing assistant, was due in part to the exacting detail with which the licensing assistant reviews these packages prior to entry into ADAMs.

- As previously discussed, the auditors noted that examination packages are entered into ADAMs in a timely manner and that successes in this area appear to be largely due to the efforts of the licensing assistant. Additionally, the orderly filing of examination packages and individual docket files was of a significant

help to the auditors; which contributed to the timely completion of this assessment.

Resource Utilization:

The resource utilization assessment considered the branch's staffing levels and the efficiency of examiner utilization. Notable observations include:

- The OB had seven certified examiners and four individuals in the process of being certified at the time of the assessment. Two of the individuals in training are scheduled to be certified by June 2002 and the remaining two individuals are scheduled to be certified by September of 2002. However, the branch continues to be challenged by changes in personnel assignments. During the assessment period, the branch lost one senior examiner due to a promotion opportunity and another due to a transfer to the NRC's Technical Training Center. The branch will soon lose another senior examiner to a promotion opportunity and will lose an examiner who has accepted a resident inspector position. Despite these changes, the branch continued to effectively meet program objectives by administering all examinations and baseline inspections as scheduled. Region III continued to recruit individuals to help bolster the examiner ranks in anticipation of future attrition.

- The auditors determined that successes with meeting Operation Plan goals appeared to be largely due to the diligence with which the OB Branch Chief managed the schedule. The Branch Chief also frequently encouraged the branch to review examination and inspection dates with facility licensees to ensure scheduled dates were accurate and to detect and resolve unforseen schedule conflicts in a timely manner. The branch revised its scheduling methodology in order to increase schedule flexibility and to provide for a more efficient use of resources. In addition, the Examiner Expectations Divisional Instruction specifically addressed chief examiner responsibilities regarding efficient utilization and conservation of examiner resources. As a result, chief examiners routinely sought out and identified ways to save resources while maintaining a high level of overall examination quality. The hours expended per examination had dropped considerably due to these efforts.

- Also contributing to the branch's successes in this area was the effective use of examiner-qualified resident inspectors (two) to assist with the examination process. Although the total additional FTE available from this resource is minimal, it is very beneficial in helping the branch meet scheduled commitments during peak examination demand times. The branch schedule continues to reflect the future participation of these individuals on examinations.

- As previously noted by the auditors, the time dedicated to branch training and discussions concerning operator licensing concepts is limited. Not only would an

increased attention to this area help ensure examiner consistency but it would help to foster improved teamwork. This is particularly true considering: 1) the amount of time examiners spend on the road performing examinations and inspections; and 2) the number of individuals either recently certified or soon to be certified within the branch. Consideration should be given to holding "workshop" style training sessions, wherein, examiners would actively participate in exercises geared toward open discussion and a common understanding of operator licensing issues.

Attachment 2

Review of Selected Year 2001 Completed Examination Packages

Braidwood Examination Administered October, 2001:

- Outlines:

  - The chief examiner requested the licensee replace a proposed JPM because it shared a Safety Function with another JPM. NUREG-1021 requires that the 10 walk-through JPMs cover at least seven different Safety Functions (i.e., Reactivity, Pressure Control, Electrical, etc.). In this case, the proposed outline covered nine Safety Functions and the two that were assigned to Safety Function 4, "Heat Removal," were diverse and discriminating. No change should have been requested.

- Documentation of Comments:

  - Comments generated on the operating exam were "hand-written" notes. These notes do not clearly document if changes were agreed to by the licensee, if changes were made, if changes were considered enhancements, or if changes were specifically required to be made to meet NUREG-1021 or other requirements.

- Written Examination (30 questions sampled):

  - Question 55 (ro) **(Q≠K/A)** - The listed K/A is 068 K4.01, "Liquid Radwaste System/safety and environmental precautions for handling hot, acidic, and radioactive liquids." The question tests the applicant's knowledge of liquid radwaste system auto realignment and does not involve safety or environmental precautions.

  - Question 59 (ro) **(Multiple Correct Answers)** - Answer "d" is also correct. If adjusting the HIGH setpoint to $5x10^{-8}$ will cause the interlock actions to occur, then adjusting the HIGH setpoint to $5x10^{-6}$ will also cause the interlock actions to occur.

  - Question 92 (ro) **(Task)** - Although an RO applicant would be expected to be able to identify which EOP applied to a given set of conditions, they would not be expected to memorize specific actions to take within the EOPs.

  - Question 94 (ro) **(Q≠K/A)** - The listed K/A is E08 EK3.3, "Pressurized Thermal Shock/manipulation of controls required to obtain desired operating results during abnormal and emergency situations." The question does not test the applicant's knowledge of the controls required to obtain the desired operating results.

Review of Selected Year 2001 Completed Examination Packages

- Question 95 (ro) **(Q≠K/A)** - The listed K/A is E09 EA1.1, "Natural Circulation Operations/components and functions of control and safety systems including instrumentation, signals, interlocks, failure modes, and automatic and manual features." The question tests the applicant's knowledge of RCP tripping criteria which is independent of natural circulation operations.

- Question 96 (ro) **(Q≠K/A)** - The listed K/A is E10 EK2.2, "Natural Circulation with Steam Void in Vessel with/without RVLIS/facilities heat removal system..." The question does not test the applicant's knowledge of a heat removal system as it applies to natural circulation conditions.

- Question 98 (ro) **(Task)** - Although an RO applicant would be expected to be able to identify which EOP applied to a given set of conditions, they would not be expected to memorize specific actions to take within the EOPs.

- Question 99 (ro) **(Q≠K/A)** - The listed K/A is E15 Generic 2.1.16, "Containment Flooding/ability to operate plant phone, paging system, and two-way radio." The question tests the applicants knowledge of how to contact the control room when heavy radio traffic is limiting ability to contact the control room. However, no knowledge of how radio use specifically applies to containment flooding is required to answer the question.

- Question 12(sro) **(Q≠K/A, Q≠SRO)** - The listed K/A is Generic 2.3.3, "Knowledge of SRO responsibilities for auxiliary systems that are outside the control room. Placing a magnetic placard on a panel in the control room does not require an SRO license. ROs post these placards in the control room regularly at Braidwood.

- Question 14(sro) **(Q≠SRO)** - ROs are also expected to recognize entry conditions into EOPs.

- Question 17(sro) **(Q≠K/A, Memory Level)** - The listed K/A is Generic 2.4.48, "Ability to interpret control room indications to verify the status and operation of system and understand how operator actions and directives affect plant and system conditions." The question only requires a memory level knowledge of the listed EOPs. Additionally, the question does not test the applicant's knowledge of how operator actions affect plant and system conditions.

- Question 83(sro) **(Q≠K/A)** - The listed K/A is Generic 2.3.2, "Knowledge of facility ALARA program." The question tests the applicant's knowledge of immediate actions in refueling accident abnormal operating procedures.

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- Operating Test:

  - JPM B.1.a, "Perform 50 ppm Boron Dilution with a Failure of 1CV111A" was written to be an "alternate path" JPM. The alternate path involved the receipt of annunciator "PW Flow Deviation." The associated annunciator response procedure directed the applicant to call an in-field operator to verify the position of valves, including verifying that valve 1CV111A is open. The scripted report from the field informed the applicant that 1CV111A was closed and that instrument air to the valve was isolated. The applicant was then expected to 1) provide verbal direction to the operator to unisolate instrument air to 1CV111A and 2) to begin the dilution. NUREG-1021, Appendix C, requires alternate path actions to be procedurally driven, not verbal directions. Also lost in this JPM is the opportunity to evaluate the applicant's ability to diagnose the problem without being prompted. Additionally, performing a dilution is a task performed during the scenarios #1 and #3.

  - JPM B.1.b, "Establish Automatic PZR Level Control with Failed 1CV121" requires the applicant to take actions nearly identical to Scenario #1, Event 3, "Controlling Pressurizer Level Channel Fails Low."

  - JPM B.1.2, "Operate a Rad Monitor," appears to be of little consequence were the applicant unable to complete the task. NUREG-1021 would require a discussion of the consequence of an applicant's actions in the event of a failure.

  - JPM B.1.g, "Respond to Increasing Level in the RDCT," has a Task Standard that states the applicant is to "return Unit 1 RDCT level to within limits." However, the JPM does not include a step (critical or otherwise) evaluating whether or not the applicant was able to return the Unit 1 RDCT level to within limits.

- Results (2 RO and 2 SRO packages sampled):

  - The write-up for JPM B.1.d (Docket 55-32679) did not include a conclusion concerning the applicant's performance or whether the applicant's response caused a critical step to not be completed. However, based on further review of the JPM, the applicant's misunderstanding of what constitutes a "duty cycle" was not considered critical.

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Clinton Examination Administered July, 2001:

- Written Examination (30 questions sampled):

  - Question 4 (ro) **(Multiple Correct Answers)** - Answer "a" is also correct. At the 15 second mark and with the given conditions in the stem, a reasonable operator might very well report that SLC had been initiated. However, he/she would then report that SLC operation is significantly impacted due to the RWCU isolation valves failing open.

  - Question 5 (ro) **(Multiple Correct Answers)** - Answer "d" is also correct. The RHR loop "B" discharge piping actually becomes the drainage path for the inadvertent loss of RPV level described in the stem.

  - Question 52(ro) **(Q≠K/A)** - The listed K/A is Generic 2.1.8, "Ability to coordinate personnel activities outside the control room." The question tests the applicant's knowledge of who, in the control room, is required to authorize control rod scram testing.

  - Question 53(ro) **(Cue)** - The question contained a note stating "Ensure T.S. Reference is NOT given out." This note cues the applicant to the fact that the correct answer involves Technical Specifications, significantly narrowing the choices of plausible distractors.

  - Question 56(ro) **(Q≠K/A)** -The listed K/A is Generic 2.2.28, "Knowledge of new and spent fuel movement procedures." The question tests the applicant's knowledge of proceduralized control rod withdrawal requirements.

  - Question 57(ro) **(Memory Level)** - The question only requires a memory level knowledge of when the banked position Withdrawal Sequence applies.

  - Question 58(ro) **(Task)** - The question requires the applicant to have memorized the radiological conditions in the vicinity of the shutdown cooling suction valve handwheel. Although they probably have a general knowledge of the radiological conditions, it would not be reasonable to expect they know the rad levels are in excess of 10 mRem.

  - Question 91(ro) **(Task)** - The question requires the applicant to have memorized EOP-1, Figure A. An RO applicant is not expected to have memorized this EOP figure. An RO would be expected to recognize when particular instrumentation may not be reliable but the basis would not be EOP-1, Figure A; it would be data points on computer screens turning magenta or erratic indication.

Review of Selected Year 2001 Completed Examination Packages

- Question 96(ro) **(Implausible Distractors**) - Distractors "a" and "b" are rendered implausible due to exam question #4 stating that the SC pumps are running with the RWCU isolation valves opened.

- Question 98(ro) **(Q≠K/A)** - The listed K/A is 295014, AA2.01, "Inadvertent Reactivity Addition/reactor power." The question tests the applicant's knowledge of the effect of closing an extraction steam shutoff valve on reactor power. However, the question does not require the applicant to ascertain that the valve was closed inadvertently. The preferred format would have been to state that the valve was inadvertently closed and have the applicant determine the impact on the plant.

- Question 5(sro) **(Q≠SRO)** - This question is nearly identical to Question 7(ro). Since question 7(ro) is suitable RO exam fodder, it would not be considered an "SRO only" question.

- Question 46(sro) **(Multiple Correct Answers)** - Answer "b" is also correct. If RTP is required to be reduced to less than 25% whenever reactor pressure is <785 psig OR core flow is <10%, then the same holds true whenever reactor pressure is <785 psig AND <10% core flow.

- Question 48(sro) **(Q≠SRO, Cue)** - The question requires the applicant to perform the same calculations and posses the same knowledge as JPM A.3. Additionally, having already performed JPM A.3, the applicant will have been cued as to how to answer this question (aside from any math errors).

- Operating Test:

  - **(JPM≠K/A)** JPM A.1.b, "Determine if Power, Flow, or Core Thermal Limits have been Exceeded," was assigned K/A Generic 2.1.19, "Ability to use the plant computer to obtain and evaluate parametric information on system or component status." The JPM required the applicant to review the latest 3-D Monicore case and identify that a number of thermal limits had been exceeded. However, the applicant was not required to utilize the plant computer to obtain the current 3-D Monicore (plant operational data). Once the applicant identified that they needed the current 3-D case to perform their evaluation, the examiner simply handed it to them.

  - JPM B.1.g, "Startup the Control Room Ventilation System (VC) in the High Radiation Mode," Step 8.3.3.8 was marked as a "critical step." Since the condition described in the step did not exist at that time, the applicant was not required to take any action. Therefore, the step should not have been considered a critical step.

Attachment 2

Review of Selected Year 2001 Completed Examination Packages

D. C. Cook Examination Administered May, 2001:

- Report:

  - Post-examination comments for written examination question 76 (ro). The write-up supporting this post-exam comment appeared to support the deletion of the question verses accepting multiple correct answers. The question was determined to be technically correct; however, the licensee claimed they did not expect RO applicants to memorize 600 VAC loads. The chief examiner agreed to provide the applicants with an electrical drawing in order to facilitate the answering of the question. However, it was later determined that the drawing provided was incomplete. Since the drawing provided could not be used to answer the question, the question should have been deleted. The auditors determined that this issue had no impact on pass/fail.

  - Post-examination comments for written examination question 75 (sro). The supporting write-up stated that due to conditions provided in the stem and the plant's response to operator actions taken, that the correct answer to the question was actually a combination of answers "c" and "d." This would have supported a decision to delete the question; however, the conclusion drawn at that time was to accept answers "c" and "d." Based on further review of the question and discussions with the examiners involved with the development and administration of the exam, the auditors determined that answer "d" was actually the only correct answer to the question. The auditors determined that accepting both answers "c" and "d," rather than just answer "d," had no impact on pass/fail decisions.

- Written Examination (30 questions sampled):

  - The attached listing of answers, K/As, and references is incomplete; many items (15) are missing applicable K/As. The listed answers for questions 1, 33, and 61 are incorrect. Also, the presentation of the listing appears to be impacted (e.g., info in wrong order, info cut off, etc.) by which computer the list is printed from.

  - Question 2(both) **(Multiple Correct Answers)** - "c" also describes a flow path that allows the rod to receive a signal to move.

  - Question 6(both) **(Q≠K/A)** - The listed K/A is 000062A102, "Loss of Nuclear Service Water/loads on the system in the control room." The question tests the applicant's knowledge of automatic pump starts and general system alignment but does not test their knowledge of associated loads.

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- Question 51(both) **(Multiple Correct Answers)** - “d” is also correct. procedurally, the RCS system pressure is required to be raised to 325-350 prior to drawing a bubble.

- Question 56(both) **(Multiple Correct Answers)** - “a” and “b” are also correct. Nothing in the stem requires the listed actions to be in any particular order. Answers “a” and “b” describe actions that would be completed if a component were discovered to be out of its required position.

- Question 59(both) **(No Correct Answer)** - Unless otherwise stated in the stem, the applicant is to assume all systems function as expected. In this case, so long as the air compressor associated with the available 1CD EDG air receiver remained functional, the 1CD EDG would have an infinite number of starts remaining. This was not an answer or distractor provided on the exam

- Question 92(ro) **(Q≠K/A)** - The listed K/A is 028K601, “Hydrogen Recombiner and Purge Control System/impact of a loss or malfunction of the system on the recombiners. The question simply tested the applicant’s knowledge of recombination temperatures and not implications of a loss or malfunction.

- Question 94 (ro) **(Multiple Correct Answers)** - The question tested the applicant’s knowledge of the purpose of a “stripped tag.” The intended correct answer (“b”) stated “denotes that the equipment is not to be operated or its status changed in any manner except by request of the permit holder.” Answer “d” stated “Provides special instructions regarding the status of equipment.” Arguably, the fact that equipment is not to be operated or its status changed in any manner except by request of the permit holder are “special instructions” regarding the status of equipment; thus, “d” is also correct.

- Question 92(sro) **(Implausible Distractors)** - Only one answer, the correct answer, would come close to being considered plausible by a reasonable operator.

- Question 93(sro) **(Q≠SRO)** - The question tests the applicant’s knowledge of Technical Specification entry conditions. ROs would also be expected to recognize Technical Specification entry conditions.

- Question 97(sro) **(Q≠SRO)** - The question tests the applicant’s knowledge of Functional Restoration Procedure entry conditions. ROs would also be expected to recognize Functional Restoration Procedure entry conditions.

Review of Selected Year 2001 Completed Examination Packages

- Operating Test:

  - The Initiating Cue for JPM SRO/RO A.1.b, "Shift Turnover," informed the applicant that they had 15 minutes to complete a turnover-style walkdown of main control room panels. There was no basis for a 15-minute timeliness criteria.

  - JPM SRO/RO A.1.b, "Shift Turnover," and A.2, "Surveillance Checks" were arguably the same JPM performed on different panels. Both JPMs evaluated the applicant's ability to perform panel walkdowns and identify panel discrepancies.

  - **(JPM≠K/A)** JPM SRO A.3, "Monitor Tank Release to CW - Review," was assigned Generic K/A 2.3.8, "Knowledge of the Process for Performing a Planned Gaseous Radioactive Release." However, the task was to perform a planned liquid release.

  - JPM B.1.d, "Fill Accumulator," required the applicant to fill an ECCS accumulator to 950 ft^3 $\pm$ 2 ft^3. There did not appear to be any consequence had an applicant failed to fill the accumulator to the desired volume. The accumulator volume was already within Technical Specification required limits. NUREG-1021 would require a discussion of the consequence of an applicant's actions in the event of a failure.

  - JPM B.1.e, "PZR Pressure Control," contained "critical steps" for the performance of logging data that were arguably not critical (K/A was "Manual operation of pressurizer heaters).

  - **(JPM≠K/A)** JPM B.1.g, "Radiation Monitor," required the applicant to obtain information pertaining to two area radiation monitors. The applicants had performed this task numerous times during the performance of simulator scenarios. This either resulted in the cuing of the applicants or could have resulted in "double jeopardy" had an individual been unable to operate the Eberline equipment. Also, the assigned K/A for the JPM was 073 A4.02, "Process Radiation Monitoring System/manually operate or monitor/system control panel." However, the JPM required the applicant to operate the control panel for "Area Radiation Monitors."

  - JPM B.1.f, "Containment Pressure Relief," initiating cue potentially "set up" applicants to fail. The cue directed the applicant to vent containment to < 2.0 psig. The Technical Specification (TS) stated containment pressure band was -1.0 psig to +0.15 psig. The JPM included a note in critical step 13 stating that the applicant was expected to establish containment pressure to within the TS band regardless of the initiating cue. Also, the Task Standard simply stated that containment pressure was to be "reduced."

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- **(JPM≠K/A)** JPM B.2.b, "Place SFP Demineralizer In Service," was assigned K/A 033 K4.01, "Spent Fuel Pool Cooling System/design features and interlocks/maintenance of spent fuel level." However, the JPM required the applicant to align SFP demineralizers. Also, there appeared to be little consequence to not aligning SFP demineralizers. NUREG-1021 would require a discussion of the consequence of an applicant's actions in the event of a failure.

- **(JPM≠K/A)** JPM B.2.c, "Perform Manual Alt. Boration," was assigned K/A 004 K4.01, "Chemical Volume Control System/design features and interlocks/oxygen control in the RCS." However, the JPM required the applicant to manually align alternate boration.

- Results (2 RO and 2 SRO packages sampled):

  - The write-up for JPM A.3 (Docket 55-32585) states that the applicant was directed to bag some contaminated, damp rags in a contaminated area near a hot spot. Prior to performing the task, the applicant was expected to review the associated RWP and determined that anti-contamination clothing Dress Code "M" applied for this type of work. The write-up states that the applicant determined that Dress Code "L" applied and that the applicant "may have become contaminated" had they performed the JPM using this Dress Code. The write-up goes on to discuss that the examiner stopped the applicant (prior to entering the contaminated area) and questioned him concerning the RWP instructions. The applicant re-reviewed the RWP and determined that Dress Code "M" actually applied. What the write-up doesn't state is that this JPM was actually performed in a "mock-up" of a contamination area. Since the applicant was in no danger of actually becoming contaminated (based on his original selection of Dress Code "L") the examiner should have allowed the applicant to complete the JPM using Code "L" and then base the pass/fail decision on the applicant's actual performance. Additionally, although the applicant corrected himself prior to entering the mocked-up contamination area, his performance on the JPM was graded as "unsatisfactory." This is not consistent with how OLB typically grades an applicant's performance considering 1) the applicant's error was self-identified and 2) the applicant was able to successfully complete the JPM.

  - An applicant (Docket 55-32585) was given a grade of "1" for his performance on competency C.5.b, "Manipulate Controls in an Accurate and Timely Manner," during Scenario 6, Event 2. The write-up stated "Although individually described weaknesses are not safety significant, the significant number of error calls for the assignment of a weighting factor of "1" in this competency. This is not consistent with OLB or NUREG-1021 grading of a "1." The basis, in accordance with NUREG-1021, should be the anchor in ES-303. In this case, no individual

error discussed in the write-up resulted in a major system perturbation; thus, a grade of “1" was not warranted. Also, NUREG-1021 does not allow for the culmination of errors to form the basis of a “1."

Palisades Examination Administered December, 2001:

- Written Examination (30 questions sampled):

  - Question 1(both) **(Q≠K/A)** - The listed K/A is 000024 K3.02, “Emergency Boration/reasons for actions in EOPs.” The question tests the applicants knowledge of cooldown limitations as they relate to performing shutdown margin calculations but not the reasons for the limitations.

  - Question 5(both) **(Multiple Correct Answers, Memory Level)** - Answer “c” is also correct. The DG may overspeed if the output breaker is opened with a load greater than 50kW. Also, this is a memory level question not a comprehensive level question.

  - Question 50(ro) **(Q≠K/A)** - The listed K/A is 000009 A2.15, “Small Break LOCA/PCS parameters,”Emergency Boration/reasons for actions in EOPs.” The question tests the applicants knowledge of changes in PCS parameters during a LOCA but does not require the applicant to discriminate between LBLOCA, MBLOCA, or SBLOCA.

  - Question 51(ro) **(Q≠K/A)** - The listed K/A is 005 K2.01, “Residual Heat Removal/bus power supplies to SDC pumps.” The question tests the applicants knowledge of EDG sequencing but does not test their knowledge of where the power is coming from.

  - Question 55(ro) **(Q≠K/A)** - The listed K/A is Generic 2.2.1, “Pre-startup procedures/plant equipment that affect reactivity.” The question tests the applicants knowledge startup activities not pre-startup activities...there is a difference.

  - Question 57(ro) **(Multiple Correct Answers)** - Answer “d” is also correct. Since the correct answer was “ensure Tave is within 3^0F of Tref,” then “ensure Tave remains 3^0F lower than Tref” would also be correct.

  - Question 59(ro) **(Q≠K/A, Memory Level)** - The listed K/A is 001 K5.36, “Control Rod Drive System/significance of sign (-) on calculated power defect.” The question tests the applicants knowledge of how power defect changes with reactor power but not the significance of the sign (-) given to power defect. Also, knowledge of how power defect changes with reactor power is memory level.

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- Question 60(ro) **(Either No Correct Answer Provided or Multiple Correct Answers)** - The question asks "Which one of the following methods of verification is NOT acceptable." The basis for the correct answer ("a") states that this IS the verification method used for the given condition. As a result, if answers "b", "c", and "d" are acceptable methods, there would be no correct answer provided. If answers "b", "c", and "d" are not acceptable methods, then each would be a correct answer. Also, the question was written using a "reverse-logic" format which is discouraged by NUREG-1021.

- Question 90(ro) **(Multiple Correct Answers)** - Answer "b" is also correct. The question asks for the "consequences" of a failure of a SG high level override. The consequences would include both moisture carryover and filling the steam lines with water. The "basis" of the SG high level override actuation is based solely on moisture carryover. The stem asks for the consequences thus answer "b" is not precluded from being correct.

- Question 96(both) **(Q≠K/A)** - The listed K/A is 017 A2.02, "In-Core Temperature Monitoring/loss or malfunction/use procedures to mitigate." The question does not test the applicants knowledge of procedures or mitigation strategy.

- Question 100(both) **(Q≠K/A)** - The listed K/A is Generic 2.3.1, "Knowledge of 10 CFR 20 and Related Facility Radiation Control Requirements." The question tests the applicants knowledge of contamination control requirements. 10 CFR 20 addresses exposure control and exposure limits, not methods used for contamination control purposes.

- Question 29 (sro) **(Q≠K/A, Memory Level)** -The listed K/A is 044 K5.02, "Steam Dump System/operation implication of steam tables, pressure, and temperature." The question tests the applicants knowledge of Technical Specification basis for brittle fracture but does not relate it to steam tables/temperature/pressure. Also, knowledge of Technical Specification basis would be considered memory level.

- Question 30 (sro) **(Q≠SRO, Multiple Correct Answers)** - This question tests the applicant's knowledge of system arrangement which would not be considered an "SRO only" level of knowledge. Also, the question asks "Which pair of radiation monitors would be useful to aid in diagnosing that the release has occurred?" The correct answer was "b", RIA-1323 and RIA-5211. Any answer that included one of these monitors would be useful in diagnosing the release. Therefore, answers "a" and "c" would also be correct.

- Question 48 (sro) **(Q≠K/A)** - The listed K/A is 000003 A1.03, "Dropped Rod/operational implications/rod control switches." The question tests the applicants knowledge of basis for tripping the plant and not which switches are used to do so.

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- Question 51 (sro) **(Q≠K/A, Q≠SRO)** - The listed K/A is 000009 A2.18, "Small Break LOCA/ccw temperature indication for RCP oil coolers." The question tests the applicants knowledge of actions relating to a main steamline break, not a LOCA. Also, general procedural usage question would not be considered "SRO only."

- Question 52 (sro) **(Memory Level)** - Knowledge of EOP basis would be considered memory level.

- Question 66 (sro) **(Q≠K/A)** - The listed K/A is 000015/17 K1.01, "Operation Implications of Natural Circulation/RCP malfunctions." The question tests the applicants knowledge of actions relating to loss of offsite power and selection of the appropriate EOP but does not require a knowledge of how natural circulation and/or RCP malfunctions relate to a loss of offsite power.

- Question 68 (sro) **(Memory Level)** - The question only requires the applicant to have a memory level knowledge of immediate actions in an EOP to answer the question.

- Question 90 (sro) **(Q≠K/A)** - The listed K/A is 000036 K3.01, "Refueling Incident/inputs that will cause a reactor building evacuation." The stem informs the applicant that an evacuation has been performed. The applicant is then simply required to select the procedure that applies.

- Operating Test:

  - JPM B.1.b, "Synch to Grid," was assigned a Safety Function of 4, "Heat Removal." Although tasks related to the main turbine generator can be credited as involving heat removal, this JPM is simply an electrical alignment of the main turbine to the grid and should have been assigned Safety Function 6, "Electrical." NUREG-1021, ES-301 requires the walk-through JPMs cover at least seven different Safety Functions. Despite this issue, seven Safety Functions were addressed.

  - JPM B.1.d, "Raise SIT Pressure," appears to have little consequence in the event an applicant failed to complete the task. The task was to raise SIT pressure to support sampling. Had the applicant failed to establish approximately 220 psig in the tank, they would have failed to complete a critical step; thus, would have failed the JPM. NUREG-1021 would require a discussion of the consequence of an applicant's actions in the event of a failure.

  - JPM B.1.f, "Place LTOP in Service," was intended to be an alternate path JPM but arguably is not. The intended alternate path required the applicant to identify

that a valve, required to be open, was closed. The applicant would then report the discrepancy and open the valve. This would not be considered a "discriminating" alternate path. Normally, procedural steps are written such that when a valve is verified open, it would be visually verified and if found to be closed, the operator would simply open it. Since the operator's response to the valve being closed would be considered a "normal" or "expected" action, and since the LTOP system and flowpath were not otherwise affected, the intended alternate path would not provide sufficient evaluation opportunity for an examiner to discriminate between a competent or incompetent operator.

- **(JPM≠K/A, K/A Importance Values <2.5)** JPM B.2.a, "Backwash Traveling Screens," was assigned K/A 086 A2.02, "Fire protection System/low header pressure," which doesn't apply to the task. Additionally, the K/As that do apply (i.e., 075 A2.08 and/or 075 K4.06) have importance values less than of 2.5 (2.0 and 1.5 respectively).

- Results (2 RO and 2 SRO packages sampled):

  - An applicant's (Docket 55-32703) package included a write-up on his performance for competency C.5.b, "Manipulate Controls in an Accurate and Timely Manner," during Scenario 1. The write-up does not include the numeric grade assigned, although the Integrated Plant Operations Grading Summary indicates that he received a "2." Review of the write-up indicates that this grade was appropriate. Additionally, the stated competency in the write-up was "C.5.6" when it should have been "C.5.b."

FISCAL YEAR 2001 REGION III OPERATOR LICENSING PLAN FOR EXCELLENCE
PART I - SPECIFIC ISSUES & ACTIONS
UPDATED as of 06/4/02 - Plan Closed

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
Inconsistencies in review of licensee submitted exams	FY-2001 Self-Assessment	Lack of specific guidance.	Generate list of inconsistencies. Develop guidance to address each inconsistency. Incorporate guidance into Region III Examiner Emphasis Document after HQ review. Ensure effective communication/ emphasis of guidance.	Communicated plan to HQ. Draft guidance completed andbranch meeting held to draw consensus branch positions. Pete incorporated consensus into draft. Drafted submitted to HQ for review on 2/22/02 - HQ comments received 5/02. Incorporated comments. Issued revised document 6/3/02. Will emphasis during routine interactions. Action Complete

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
Need to improve industry communications with respect to NRC exam review process and recent experience in licensee screening of applicants.	FY-2001Self-Assessment	Lack of initiatives due to competing priorities.	Start participation in some MNTA quarterly meetings. Conduct Region III workshop (if resources allow.) Continue participation in annual MNTA instructor workshop and NEI meetings.	Participated in MNTA June 2001 quarterly meeting. Attending others as resources permit. Preliminary discussions started with MNTA. Targeting early CY-2003. Discussed during presentation at Oct. 2001 MNTA meeting. Continuing periodic participation in meetings with NEI OL focus group. As noted in FY-2002 Self-Assessment, licensee screening of applicants improved resulting in drop in failure rate. Actions Complete

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
Master examination package backlog for ADAMS entry.	FY-2001 Self-Assessment	Lack of regional resources for ADAMS entry.	Acquire contractor help for ADAMS entry.	Backlogged packages entered into ADAMS by contractors as of 8/6/01. Actions Complete
A few exams had high number of post-exam changes and some of the changes were NRC preventable.	FY-2001 Self-Assessment	Exam review rigor.	Compile list of NRC preventable post-exam changes and provide training.	Bruce Palagi performed detailed evaluation and presented findings/training during December 2001 regional counterparts meeting breakout session. Will continue to evaluate metrics and will take additional actions if necessary. Actions Complete

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
Three unresolved items greater than allowed 6 months.	FY-2001 Self-Assessment	Competing priorities	Close the three unresolved items and provide increased focus on timeliness in this area.	As of 12/27/01, all three items closed. No remaining unresolved items are open in the Operations Branch. Actions Complete
Inspection planners not being submitted to DRS secretaries for retention.	FY-2001 Self-Assessment	Attention to detail	Remind staff of need to provide the planners and develop method to track.	E-mail reminder provided 10/17/01. Will take additional action if this looks like continued problem. Per check done during FY-2002 Self-Assessment, this problem appears to be resolved. Actions Complete

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
Low overall examiner experience in branch (i.e. high percentage of new examiners)	FY-2001 Self-Assessment	Staff attrition / Increased staffing level due to higher exam demand	Continue emphasis on hiring. Continue focus on improving teamwork and high quality peer reviews to minimize errors. Ensure close focus on certification activities and mentoring for new employees. Provide developmental opportunities to staff as resources allow.	Initial hiring efforts were successful. All budgeted and overage positions were filled, several with highly experienced staff. Will continue same high level of effort as vacancies occur. Routine focus on teamwork and peer reviews through supervisory oversight and performance appraisal process. Mentors addressed in Examiner Expectations Divisional Instruction. Certification plans in place for new examiners. List of opportunities made available to staff. Actions Complete

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
Examiner-certified RI not current on examiner refresher training	FY-2001 Self-assessment	Lack of tracking mechanism	Address training needs of the examiner-certified RI. Create tracking mechanism similar to that used for inspector refresher training	Examiner-certified RI transferred to TTC and is teaching technical training courses. Draft MC-1245 revises technical training refresher requirement for examiners to be consistent with inspector requirement which already has a regional tracking mechanism. Have requested HR to add tracking mechanism for examiner techniques refresher training once revised MC-1245 issued. Transfer issue to FY-2002 plan.

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
Examiner/Inspector Security Issues	FY-2001 Events	Attention to Detail Poor Judgement	Re-emphasize during branch meetings. Update regional guidance to provide additional expectations in this area for examiners	Discussions held in branch meetings. Added additional guidance to Examiner Emphasis Document to emphasize this area. Revised document issued 6/3/02. Actions Complete
Various problems with written examination quality such as K/A matches, question difficulty, non-credible distractors, insufficiently detailed explanations of K/A rejections, SRO questions not applicable to 55.43(b) areas, and absence of references to learning objectives and distractor plausibility information.	FY-2001 Fermi Exam Audit	Exam review rigor	Provide audit report to examiners. Provide training on audit report findings.	Audit report provided to examiners for review. Training on audit report findings provided to examiners during regional counterparts meeting breakout session. Effectiveness to be evaluated by future exam audits and additional actions taken if necessary. Actions Complete

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
One example of as-given scenario forms not revised to reflect events or expected operator actions changes during administration.	FY-2001 Fermi Exam Audit	Process Knowledge Deficiency	Provide audit report to examiners. Provide training on audit report findings	Audit report provided to examiners for review. Training on audit report findings provided to examiners during regional counterparts meeting breakout session. Effectiveness to be evaluated by future exam audits and additional actions taken if necessary. Actions Complete

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
One instance in which an RO and SRO were both faulted for communications deficiency, but only one was rated down.	FY-2001 Fermi Exam Audit	Attention to Detail	Provide audit report to examiners. Provide training on audit report findings	Audit report provided to examiners for review. Training on audit report findings provided to examiners during regional counterparts meeting breakout session. Effectiveness to be evaluated by future exam audits and additional actions taken if necessary. Actions Complete

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
A few instances in which scenario critical steps were not identified appropriately.	FY-2001 Fermi Exam Audit	Exam Review Rigor	Provide audit report to examiners. Provide training on audit report findings	Audit report provided to examiners for review. Training on audit report findings provided to examiners during regional counterparts meeting breakout session. Effectiveness to be evaluated by future exam audits and additional actions taken if necessary. Actions Complete

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
One instance in which applicant failed to complete critical step but was judged SAT without sufficient justification documented.	FY-2001 Fermi Exam Audit	Attention to Detail	Provide audit report to examiners. Provide training on audit report findings	Audit report provided to examiners for review. Training on audit report findings provided to examiners during regional counterparts meeting breakout session. Effectiveness to be evaluated by future exam audits and additional actions taken if necessary. Actions Complete

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
An exam entered into ADAMS did not include handouts or reference to handouts.	FY-2001 Fermi Exam Audit	Process Knowledge Deficiency	Provide audit report to examiners. Provide training on audit report findings	Audit report provided to examiners for review. Training on audit report findings provided to examiners during regional counterparts meeting breakout session. Effectiveness to be evaluated by future assessment activities such as exam audits and additional actions taken if necessary. Actions Complete

122. Continue to emphasize basic concepts personified in the Examiner Expectations Divisional Instruction, such as general ownership, responsibility, and accountability, through routine interaction, close management oversight, and the performance appraisal process. Empower the examiners to make decisions and to practice this high level of responsibility.

123) Continue focus on interaction with OL staff from HQ and other regional offices through emphasis on related concepts in the Examiner Expectations Divisional Instruction and support of examiner exchanges as the schedule permits.

124) Ensure that lessons learned from earlier audits and self-assessments are captured and continue to be emphasized through the Examiner Emphasis Document and incorporation of lessons learned documents into the examiner certification process.

125) Continue to emphasize through routine interactions and the performance appraisal process the need to maintain high branch and individual self-assessment capability and to implement action to address noted problem areas.

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS

FISCAL YEAR 2002 REGION III OPERATOR LICENSING PLAN FOR EXCELLENCE
PART I - SPECIFIC ISSUES & ACTIONS
UPDATED as of 07/26/02

ISSUE SOURCE ROOT CAUSE X-REF SPECIFIC ACTIONS STATUS

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
Examiner-certified RI not current on examiner refresher training	Transferred from FY-2001 Plan for Excellence	Lack of Tracking Mechanism	Address training needs of the examiner-certified RI. Create tracking mechanism similar to that used for inspector refresher training.	Examiner-certified RI transferred to TTC and is teaching technical training courses. Draft MC-1245 revises technical training refresher requirement for examiners to be consistent with inspector requirement which already has a regional tracking mechanism. Have requested HR to add tracking mechanism for examiner techniques refresher training. HR requested action from IT staff 4/02.

ISSUE SOURCE ROOT CAUSE X-REF SPECIFIC ACTIONS STATUS

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
Written examination quality issues such as K/A matches, question difficulty, non-credible distractors, insufficiently detailed explanations of K/A rejections, SRO questions not applicable to 55.43(b) areas, and modified questions which did not fit definition of modified.	Kewaunee Exam Audit Point Beach Exam Audit FY-2002 Self-Assessment 2002 Biennial Review of the Operator Licensing Program Office	Exam Review Rigor	Provide copies of self-assessment and audit reports to examiners. Discuss self-assessment and exam audit issues in branch meetings or regional seminar. Assign examiners to cover exam review topics in branch meetings. Conduct internal workshop (estimated 3/03).	Self-assessment, Kewaunee audit report, and and the 2002 Biennial Review of the Operator Licensing Program Office were provided to examiners. Self-assessment, Kewaunee audit results and and the 2002 Biennial Review of the Operator Licensing Program Office preliminary results training provided 5/28/02 during regional seminar breakout sessions.
An exam entered into ADAMS did not include handouts or reference to handouts.	Kewaunee Exam Audit	Process Knowledge Deficiency	Discuss need to include handouts or list of handouts during regional seminar. Incorporate requirement to include handouts or list of handouts in Examiner Emphasis Document.	Discussed on 5/28/02 during regional seminar breakout sessions. Revised Emphasis Document issued 6/3/02. Actions complete.

ISSUE SOURCE ROOT CAUSE X-REF SPECIFIC ACTIONS STATUS

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
Absence of references to learning objectives and distractor plausibility information	Kewaunee Exam Audit	Process Knowledge Deficiency	Discuss with HQ to determine expectation and then determine necessary actions.	
Did not identify that licensee failed to incorporate some agreed upon question fixes.	Kewaunee Exam Audit	Exam Review Rigor	Discuss during regional seminar need to ensure quality review of final ready to administer exam.	Discussed on 5/28/02 during regional seminar breakout sessions. Actions complete.
Applicant exam comments not included in ADAMS exam package	Kewaunee Exam Audit	Process Knowledge Deficiency	Discuss with HQ to determine expectation and then determine necessary actions.	
No way to confirm copies of answer sheets were made prior to grading.	Kewaunee Exam Audit	Process Knowledge Deficiency	Discuss with HQ to determine expectation and then determine necessary actions.	
Some applicants changed answers on answer sheet without initialing.	Kewaunee Exam Audit	Applicant Error	Discuss with HQ to determine expectation for examiners to prevent and how to handle when it occurs. Then determine necessary action.	

ISSUE SOURCE ROOT CAUSE X-REF SPECIFIC ACTIONS STATUS

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
Not all examiners involved in applicant exam signed ES-303 coversheet	Kewaunee Exam Audit	Process Knowledge Deficiency	Discuss during regional seminar. Revise Examiner Expectations Document to address this area.	Discussed on 5/28/02 during regional seminar breakout sessions.
No justification documentation for accepting JPM referencing a K/A with a value of <2.5. (Station K/A was >2.5).	Kewaunee Exam Audit	Lack of Documentation Rigor	Discuss during regional seminar.	Discussed on 5/28/02 during regional seminar breakout sessions. Actions complete
Control board evaluation for SRO-U was given grade although not examined in that area.	Kewaunee Exam Audit	Inattention to Detail	Discuss during regional seminar. Increase focus during branch chief reviews.	Discussed on 5/28/02 during regional seminar breakout sessions. Increased focus of this issue is being provided during branch chief reviews. Action complete

ISSUE SOURCE ROOT CAUSE X-REF SPECIFIC ACTIONS STATUS

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
Examiners failed to collect applicant generated material after dynamic scenarios	Point Beach Exam Audit	Process Knowledge Deficiency	Issue e-mail to advise examiners of problem. Discuss during branch meeting.	E-mail issued immediately after exam.
Examiner appeared to be leading applicant during JPM administration.	Point Beach Exam Audit	Exam Administration Skill Deficiency	Issue e-mail to advise examiners of problem. Discuss during branch meeting.	E-mail issued immediately after exam

ISSUE SOURCE ROOT CAUSE X-REF SPECIFIC ACTIONS STATUS

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
Operating test quality issues such as alternate path JPM not procedurally driven, JPMs nearly identical to actions in scenarios, JPMs with no safety significance, JPM titles not reflecting actual JPMs performed, JPMs did not match K/As cited, critical tasks not critical in some JPMs, control room walkdown had 15 minute time limit with no basis for time limit, two admin JPMs appeared to be the same JPM but different panels, and SRO-U examined on only 4 versus 5 systems during JPMs.	FY-2002 Self-Assessment Kewaunee Exam Audit 2002 Biennial Review of the Operator Licensing Program Office	Exam Review Rigor	Provide copy of self-assessment and audit reports to examiners. Discuss self-assessment and exam audit results in regional seminar. Assign examiners to cover exam review topics in branch meetings. Conduct internal workshop (estimated 3/03).	Self-assessment, and Kewaunee audit report, and 2002 Biennial Review of the Operator Licensing Program Office provided to examiners. Self-assessment, audit results and 2002 Biennial Review of the Operator Licensing Program Office preliminary results discussed on 5/28/02 during regional seminar breakout sessions.

ISSUE SOURCE ROOT CAUSE X-REF SPECIFIC ACTIONS STATUS

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
Examination grading issues such as one question should have been deleted vs having 2 correct answers, one question should have been deleted because reference was not adequate to provide needed assistance, applicants were graded as unsatisfactory for an A.3 JPM based on applicant failure to properly interpret dress-out requirements vice actual inadequate performance, applicant was assigned a “1” based on cumulative errors, and an examiner failed to adequately complete an ES-303 for an applicant.	FY-2002 Self-Assessment. 2002 Biennial Review of the Operator Licensing Program Office.	Lack of rigor during examination grading process. Process Knowledge Deficiencies.	Provide copy of self-assessment to examiners. Discuss self-assessment in branch meeting. Conduct internal workshop (estimated 3/03).	Self-assessment provided to examiners. Self-assessment results and preliminary results of the operator licensing office audit discussed during 5/02 branch meeting.

ISSUE SOURCE ROOT CAUSE X-REF SPECIFIC ACTIONS STATUS

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
Improvements needed with Communication of Examination quality expectations with facility licensees.	FY-2002 Self-Assessment.	Exam review rigor.	Provide copy of self-assessment and audit reports to examiners. Discuss self-assessment and exam audit results in regional seminar. Assign examiners to cover exam review topics in branch meetings. Conduct internal workshop (estimated 3/03).	Self-assessment, Kewaunee audit report, and and the 2002 Biennial Review of the Operator Licensing Program Office were provided to examiners. Self-assessment, Kewaunee audit results and and the 2002 Biennial Review of the Operator Licensing Program Office preliminary results training provided 5/28/02 during regional seminar breakout sessions.

ISSUE SOURCE ROOT CAUSE X-REF SPECIFIC ACTIONS STATUS

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
Performance deficiencies noted regarding post-examination comment resolution.	2002 Biennial Review of the Operator Licensing Program Office. FY-2002 Self-Assessment.	Branch approach to rigidity/flexibility in evaluating license post-examination comments.	Provide copy of self-assessment and the 2002 Biennial Review of the Operator Licensing Program Office to examiners. Discuss self-assessment and the 2002 Biennial Review of the Operator Licensing Program Office results during branch meeting. Conduct internal workshop (estimated 3/03).	Self-assessment and the 2002 Biennial Review of the Operator Licensing Program Office provided to examiners. Self-assessment and the 2002 Biennial Review of the Operator Licensing Program Office preliminary results discussed 5/28/02 during regional seminar breakout sessions.

ISSUE SOURCE ROOT CAUSE X-REF SPECIFIC ACTIONS STATUS

ISSUE	SOURCE	ROOT CAUSE X-REF	SPECIFIC ACTIONS	STATUS
A facility licensee (D.C. Cook) did not provide any substantive justification for a requested operating test waiver as it related to an applicant's request for a written examination re-take.	2002 Biennial Review of the Operator Licensing Program Office.	Lack of rigor during a Branch review of the waiver request. Process Knowledge Deficiencies.	Provide copy of the 2002 Biennial Review of the Operator Licensing Program to examiners. Discuss 2002 Biennial Review of the Operator Licensing Program results during regional seminar.	2002 Biennial Review of the Operator Licensing Program Office provided to examiners. Biennial Review of the Operator Licensing Program Office preliminary results discussed 5/28/02 during regional seminar breakout sessions.

126. Continue to emphasize basic concepts personified in the Examiner Expectations Divisional Instruction, such as general ownership, responsibility, and accountability, through routine interaction, close management oversight, and the performance appraisal process. Empower the examiners to make decisions and to practice this high level of responsibility.

127) Continue focus on interaction with OL staff from HQ and other regional offices through emphasis on related concepts in the Examiner Expectations Divisional Instruction and support of examiner exchanges as the schedule permits.

128) Ensure that lessons learned from earlier audits and self-assessments are captured and continue to be emphasized through the Examiner Emphasis Document and incorporation of lessons learned documents into the examiner certification process.

129) Continue to emphasize through routine interactions and the performance appraisal process the need to maintain high branch and individual self-assessment capability and to implement action to address noted problem areas.