



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
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September 30, 2004

Southern Nuclear Operating Company, Inc.
ATTN: Mr. L. M. Stinson
Vice President
P. O. Box 1295
Birmingham, AL 35201

SUBJECT: SENIOR REACTOR OPERATOR **RETAKE** EXAMINATION - FARLEY
NUCLEAR PLANT - 05000348/2004302, 05000364/2004302

Dear Mr. Stinson:

On August 24, 2004, members of your training staff administered an NRC Senior Reactor Operator initial retake written examination to two employees of your facility who had applied for a license to operate the Farley Nuclear Plant. The NRC waived the operating examinations. At the conclusion of the examination, the examiner discussed the examination questions and preliminary findings with those members of your staff identified in the enclosed report.

The two SRO applicants who received this portion of the operating examination passed the examination, representing a 100 percent pass rate. The NRC resolution of post examination comments is included in this report as Enclosure 2.

In accordance with 10 CFR 2.390 of the NRC's Rules of Practice, a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) components of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Michael E. Ernstes, Chief
Operator Licensing and
Human Performance Branch
Division of Reactor Safety

Docket Nos. 50-348, 50-364
License Nos. NPF-2, NPF-8

Enclosures: (See page 2)

Enclosures: 1. Report Details
2. NRC Resolution of Comments

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NUCLEAR REGULATORY COMMISSION

REGION II

Docket Nos.: 05000348, 05000364

License Nos.: NPF-2, NPF-8

Report Nos.: 05000348/2004302, 05000364/2004302

Licensee: Southern Nuclear Operating Company, Inc. (SNC)

Facility: Joseph M. Farley Nuclear Plant, Units 1 and 2

Location: 7388 N. State Highway 95
Columbia, AL 36319

Date: Written Examination - August 24, 2004

Examiners: G. Hopper, Chief Examiner

Approved by: M. Ernstes, Chief
Operator Licensing and Human Performance Branch
Division of Reactor Safety

SUMMARY OF FINDINGS

ER 05000348/2004-302, ER 05000364/2004-302; 8/24/2004; Joseph M. Farley Nuclear Plant, Units 1 & 2; Licensed Operator Examinations.

The NRC conducted an operator licensing initial retake examination in accordance with the guidance of NUREG-1021, Draft Revision 9, Operator Licensing Examiner Standards for Power Reactors. This examination implemented the operator licensing requirements of 10 CFR §55.43.

The facility licensee administered the written retake examination on August 24, 2004. The operator licensing initial written retake examination was developed by the licensee. Two Senior Reactor Operator (SRO) applicants passed this retake written examination and were issued a license.

No findings of significance were identified.

Report Details

4. OTHER ACTIVITIES (OA)

4OA5 Operator Licensing Initial Examinations

a. Inspection Scope

The examiners reviewed the written examination developed by the licensee for compliance with the guidelines specified in NUREG-1021, Draft Revision 9.

The examiners reviewed the licensee's examination security measures while preparing and administering the examinations to ensure examination security and integrity complied with 10 CFR 55.49, Integrity of Examinations and Tests.

The examiners evaluated two SRO applicants who were being assessed under the guidelines specified in NUREG-1021. Members of the Farley training staff administered the written examination on August 24, 2004. The evaluation of the applicant and review of documentation were performed to determine if the applicant met requirements specified in 10 CFR Part 55.

b. Findings

No findings of significance were identified. The examination materials submitted by the licensee were acceptable. Both applicants passed the examination.

The licensee submitted two post examination comments concerning the written examination. The combined RO/SRO written examinations and references, and licensee's post examination comments may be accessed in the ADAMS system (ADAMS Accession Numbers ML042680021 and ML042680027).

4OA6 Meetings

Exit Meeting Summary

On September 23, 2004, the examination team conducted a telephone conversation with Mr. Joel Deavers to discuss the examination results. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

Licensee personnel

J. Deavers, Senior Plant Instructor
J. Horn, Training Manager
G. Ohmstede, Plant Instructor

NRC RESOLUTION OF COMMENTS

Question #76

Comment: The question required the applicant to recognize the action that would be taken for a dropped control rod that would meet technical specification requirements. The applicant was given information which included that Control Bank D rod F-6 DRPI rod bottom light is lit and Bank D is at 176 steps. The answer stated, "Restore the dropped rod to 165 steps in the next hour so that Local Xenon Redistribution will not be significant." The applicant was expected to note that the dropped rod was recovered to within 12 steps of Bank D and therefore met the requirements of Technical Specification (TS) 3.1.4. The intent of the question was to give empirical or actual rod positions. No reference to GRPI or DRPI was given. The licensee contends that there is no DRPI LED indication for 165 steps and therefore it must be a GRPI indication. Accounting for theoretical errors which can possibly exist in the indications, the actual rod position could be greater than 12 steps from the group, and not meet the TS. The licensee then attempted to justify distractors "a" and "b" as additional correct answers. Based on the argument that the AFD remained in spec before and during the event, TS 3.2.3 (Axial Flux Difference) was satisfied before, during, and after the event, and the actions taken in distractors "a" and "b" satisfy the TS. The licensee recommended that the question be deleted from the examination.

NRC Resolution: Recommendation not accepted. The NRC is aware that occasionally the stem of a question may not contain all of the information or clarity that is desired. For that reason, the applicants are given a briefing contained in Appendix E of NUREG 1021 which includes the following instructions. Part B item 7 states;

If you have any questions concerning the intent or the initial conditions of a question, do *not* hesitate asking them before answering the question. Ask questions of the NRC examiner or the designated facility instructor *only*. When answering a question, do *not* make assumptions regarding conditions that are not specified in the question unless they occur as a consequence of other conditions that are stated in the question. For example, you should not assume that any alarm has activated unless the question so states or the alarm is expected to activate as a result of the conditions that are stated in the question. Finally, answer all questions based on actual plant operation, procedures, and references. If you believe that the answer would be different based on simulator operation or training references, you should answer the question based on the *actual plant*.

If the applicant had questions about which indication the 165 steps referred to, he should have asked the proctor a question rather than assuming a condition that was not specified in the question, i.e., the 165 steps must be GRPI indication. The question/answer log for this exam indicated that no questions were asked by the candidates concerning this question when the exam was administered.

With regards to distractors "a" and "b" being correct, the licensee did not address that the given reason for the power reductions in distractors a and b are clearly wrong for this event. AFD was never out of limits and there was never any concern for the Heat Flux Hot Channel Factor

being exceeded. The wrong reason associated with the actions of distractors “a” and “b” makes the distractors incorrect. The only correct answer associated with the question was choice “c”. No changes to the answer key were made.

Question # 95

Comment : The question required the applicant to recognize what would be required to reinstate a containment purge following completion of a Local Leak Rate Test. The indicated correct answer stated, “A current Gaseous Release Permit is required to be issued.” The licensee contends that the wording of the answer is ambiguous, in that, a gaseous release permit is always in effect for one week intervals and would not be required to be issued. The permit would have to be current. Therefore, the answer should have been, “A gaseous release permit is current.” The licensee recommended that the question be deleted from the exam since there was no correct answer.

NRC Resolution: Recommendation accepted. The NRC noted that procedure FNP-0-CCP-213, “Chemistry-Radiochemistry Control Procedure,” stated that, “For releases made in the continuous mode, the permit authorizing the release remains in effect for up to eight days.” The containment purge (CP) release permit is issued on a weekly basis and is not reissued each time containment purge is stopped and started. The procedure also required a Plant Vent Stack Permit (PVS) be in place which is also updated weekly. The procedure further stated, if either the CP or PVS permits must be updated, then both the CP and PVS permits must be updated.” The NRC acknowledges that the wording of the intended answer is confusing since something which is current should not have to be issued. In addition, if the CP permit was to be updated, then the PVS permit would have to be updated. Therefore two permits would be required to be issued. The intended answer only used the words, “Gaseous Release Permit,” and did not specify the CP permit or the PVS permit. Since two permits would have to be issued if an update were required, the answer is also technically incorrect. In addition, distractor “C” stated, “Verify alternate sampling is being performed as required per the ODCM.”

For the information given in this question, the ODCM did not require any alternate sampling. However, the wording of the distractor was a motherhood statement which could be interpreted as always a true statement. Verify alternate sampling is being performed as required -- per the ODCM, could always be considered a true statement. Verify alternate sampling is being performed -- as required by the ODCM (for this instance) would not be correct. The NRC determined that the question was technically incorrect was therefore deleted from the examination.