

January 19, 2005

Mr. Christopher M. Crane
President and CNO
Exelon Nuclear
Exelon Generation Company, LLC
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: REQUALIFICATION PROGRAM EVALUATION
PEACH BOTTOM ATOMIC POWER STATION

Dear Mr. Crane:

In a telephone conversation on January 18, 2005, Herb Williams, Sr. Operations Engineer and Bob Artus, Principal Requal Training Instructor arranged to evaluate the requalification program and licensed personnel at the Peach Bottom Atomic Power Station. The evaluation is scheduled for the week of March 14, 2005. NRC examiners and evaluators from your facility will conduct requalification examinations, and the NRC will evaluate your requalification program in accordance with Sections ES-601 through ES-604 of NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 9. You are encouraged to ensure that your training staff and proposed examinees are familiar with these standards.

For the NRC to adequately prepare for this evaluation, the facility licensee will need to furnish the NRC with the approved items listed in Enclosure 1, "Reference Material Guidelines." You are also requested to submit at your option, a proposed examination for use during the examination week. However, if you do submit a proposed examination, the personnel participating in its development will become subject to the security restrictions described in this letter.

Please review the guidance promulgated in Revision 9 of NUREG-1021 concerning the content and scope of simulator examination scenarios. The scenario examination bank should cover the entire spectrum of emergency operating procedures (EOPs), including alternative decision paths within the EOPs, and it should incorporate a range of failures with various degrees of severity for the same type of event. Each scenario should contain simultaneous events that require the senior reactor operators (SROs) to prioritize their actions and to assign particular tasks to other crew members. Each scenario should also require the SROs to decide when to make the transition between EOPs and which actions to take within EOPs.

You are requested to designate at least one employee to be a member of a joint NRC-facility examination team. That employee is expected to be an active SRO [as defined by Title 10, Section 55.53(e) or (f) of the *Code of Federal Regulations* (10 CFR 55.53(e) or (f))] from the Peach Bottom Atomic Power Station operations department. You are encouraged to designate a second employee from the training staff to be a member of the examination team. This employee should also be a licensed SRO, but may be a certified instructor. If desired and agreed to by the chief examiner, you may designate one additional employee from the training

staff who has appropriate qualifications to be a member of the examination team. In addition to these individuals, you will need to designate a simulator operator for scenario preview and validation during the onsite examination preparation week. In some cases, you may also need to designate a simulator operator during the test item review period. All of these individuals will be subject to the examination security agreement.

The NRC restricts any facility licensee representatives under the security agreement from knowingly communicating (by any means) the content or scope of the examination to unauthorized persons, and/or participating in any facility licensee programs (such as instruction, examination, or tutoring) in which an identified requalification examinee will be present. These restrictions apply from the day that the facility licensee representative signs the examination security agreement indicating that the representative understands that he or she has specialized knowledge of the examination. The chief examiner will determine when a facility licensee representative has received specialized knowledge concerning the examination and will execute an examination security agreement. In most cases, the examination team members will not be required to enter into an examination security agreement more than 60 days before the examination week. The simulator operator will normally become subject to the security restrictions during the examination preparation and validation week; however, this may occur as much as 45 days before the examination week.

Sixty days before the examination administration date, please provide the NRC's regional office with a proposed list of operators, including crew composition, for the examination. The list should include at least 12 operators, comprising three or more crews, and the current mailing address for each proposed operator, if different from that listed on the most recent Form 398 submitted to the NRC. Your training staff should send this information directly to the NRC's chief examiner, ensuring that each operator's address is sent in a manner to ensure privacy.

The facility licensee may request that the NRC chief examiner or another NRC representative meet with the licensee managers and the operators to be examined during the examination preparation week, normally two weeks before the examination. However, if the schedule does not allow them to meet during the preparation week, they may meet at any mutually agreeable time. The NRC examiner will explain the examination and grading processes and will respond to any questions that the operators may have about the NRC's examination procedures. If such a meeting is desired, your training staff should schedule it with the NRC's chief examiner.

The facility licensee staff is responsible for providing adequate space and accommodations to properly develop and conduct the examinations. Enclosure 2, "Administration of Requalification Examinations," describes our requirements for developing and conducting the examinations. Also, a facility operations management representative above a shift supervisor level should observe the simulator examination process at the site.

This letter contains information collections that are subject to the *Paperwork Reduction Act of 1995* (44 U.S.C. 3501 et seq.). These information collections were approved by the Office of Management and Budget under approval number 3150-0018, which expires on June 30, 2006.

The public reporting burden for this collection of information is estimated to average 25 hours per response, including the time for reviewing instructions, gathering and maintaining the necessary data, and completing and reviewing the collection of information. Send comments on any aspect of this collection of information, including suggestions for reducing the burden to

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the Information and Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001, or by electronic mail to bjs1@nrc.gov; and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0018), Office of Management and Budget, Washington, D.C. 20503.

The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

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

Thank you for your cooperation in this matter. Mr. Artus has been advised of the NRC guidelines and policies addressed in this letter. If you have any questions on the evaluation process, please contact Richard J. Conte, Chief Operations Safety Branch at (610) 337-5183.

Sincerely,

/RA/

Richard J. Conte, Chief
Operational Safety Branch
Division of Reactor Safety

Docket No. 50-277, 50-278
License No. DPR-44, DPR-56

Enclosures: 1. Reference Material Guidelines
2. Administration of Requalification Examinations

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cc w/encl:

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Commonwealth of Pennsylvania (c/o R. Janati, Chief, Division of Nuclear Safety,
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Public Service Commission of Maryland, Engineering Division
Board of Supervisors, Peach Bottom Township
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TMI - Alert (TMIA)
J. Johnsrud, National Energy Committee, Sierra Club
Mr. & Mrs. Kip Adams
T. Snyder, Director, Air and Radiation Management Administration,
Maryland Department of the Environment (**SLO**)

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Distribution w/encl: **(via E-mail)**

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DATE	01/19/05		01/19/05		01/19/05			

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Reference Material Guidelines

1. Sixty days before the examination date, the facility licensee should provide test items to the NRC to support all aspects of the requalification examination.
2. The facility licensee is expected to submit the following reference materials for all NRC-conducted requalification examinations:
 - an examination sample plan that meets the requirements of Attachment 3 to ES-601
 - the facility's examination banks (written, simulator, and JPM) and associated reference materials (including, at a minimum, technical specifications, abnormal and emergency operating procedures, and emergency plan procedures utilized in requalification training)
 - additional reference materials requested by the NRC's chief examiner
3. The facility licensee's examination banks are expected to contain the following information:
 - a minimum of 700 test items equally divided for use in the two sections of the written examination and covering all safety-related elements of the facility's job task analysis (JTA). The facility licensee is expected to maintain a dynamic bank by reviewing, revising, or generating at least 150 questions a year. New questions should cover equipment and system modifications, as well as recent industry and licensee events and procedural changes.
 - JPMs that meet the criteria in ES-603 for evaluating each reactor operator (RO) and senior reactor operator (SRO) safety-related task identified in the facility's JTA. The JPM bank should expand at a rate of at least 10 JPMs per year until this goal is reached. It is estimated that 125 to 150 JPMs will be the final result.
 - a bank of at least 30 simulator scenarios reflecting all abnormal and emergency situations to which an operator is expected to respond or control. At least five scenarios per year should be generated until all aspects of the emergency operating procedures are covered with sufficient variation in the type and scope of initiating events and level of degradation. Emphasis should be placed on scenarios that include applicable industry events.

Administration of Requalification Examinations

1. The NRC must evaluate at least 12 operators to perform a program evaluation. The guidelines on crew composition in the simulator are described in Section D.2 of ES-601 and ES-604.
2. The simulator and simulator operators need to be available for examination development. The chief examiner and the facility representatives will agree on the dates and amount of time needed to develop the examinations.
3. The chief examiner will review the reference materials used in the simulator. The NRC will not authorize for use during the simulator test any reference material that is not normally used for plant operation in the control room.
4. The facility licensee will provide a single room for completing Section B of the written examination. The examination room and supporting restroom facilities will be located to prevent the examinees from having contact with any other facility or contractor personnel during the examination.
5. The chief examiner will inspect the examination room to see that it meets the minimum standard that will ensure examination integrity. The minimum spacing standard consists of one examinee per table and a 1-meter (3-foot) space between tables. No wall charts, models, or other training materials are allowed in the examination room.
6. The facility licensee is expected to provide a copy of each reference document for each examinee for Section B of the written examination. The material should include documents that are normally available to the operators in the control room (such as the technical specifications, operating and abnormal procedures, administrative procedures, and emergency plans). The chief examiner will review the reference materials before the examination begins.
7. The NRC's requalification examination will attempt to distinguish between RO and SRO knowledge and abilities to the extent that the facility training materials allow the developers to make these distinctions.
8. Prudent scheduling of examination week activities is important to help alleviate undue stress on the operators. The facility training staff and the NRC chief examiner should attempt to formulate a schedule that will minimize delays while conducting the examination. The following suggestions will help to structure the examination activities to achieve this objective:
 - Consider allowing operators to stay at home until their scheduled examination times.
 - Segregate the group of operators who are completing their examination, instead of the group of operators who are scheduled to start their examination.
 - Following simulator scenarios, the facility evaluators and NRC examiners should quickly determine whether followup questioning is required so that the crew members may be released to talk among themselves about the scenario.

Administration of Requalification Examinations

- Ensure that time validation of JPMs, particularly those performed in the simulator, is accurate. Establish a reasonable schedule to prevent operators from waiting for simulator availability to complete their JPMs.
9. The NRC does not require the facility licensee to videotape dynamic simulator examinations. If the facility licensee requests to videotape the examination, any use of the tape must be completed before the NRC leaves the site at the end of the examination. If a disagreement over the grading of an operator's examination still exists at the end of the examination week, the facility licensee may retain the tape for the purpose of submitting it to support a request for regrading by the NRC. During the regrading, the NRC will review only the portion of the videotape under contention. After all requalification examination grades are finalized, including the review of any regrading requests, the facility licensee is expected to erase all video tapes made during the examination.