



January 25, 2006
RC-06-0027

Mr. W. D. Travers
U. S. Nuclear Regulatory Commission
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW, Suite 23T85
Atlanta, GA 30303-8931

Dear Mr. Travers:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
INITIAL OPERATOR LICENSE WRITTEN EXAMINATION
POST-EXAMINATION COMMENTS

On January 10, 2006, South Carolina Electric & Gas Company (SCE&G) conducted initial license written examinations for nine individuals applying for reactor operator (RO) and senior reactor operator (SRO) licenses for the V.C. Summer Nuclear Station (V.C. Summer). This letter provides our comments on this written examination consistent with guidance in NUREG 1021, "Operator Licensing Examination Standards for Power Reactors," Section ES-402.E. NUREG 1021 states that a licensee should submit comments to the NRC within five working days of administration of the examination. However, on January 13, 2006, the NRC (e.g., Region II management and the Chief Examiner) verbally granted an additional five working days to provide the NRC with our comments.

The apparently high failure rate for the January 10, 2006, written examination is inconsistent with our historical dedication to excellence. Post-examination efforts are focused on ensuring that the causes of the apparent high failure rate are identified and that corrective actions are implemented that will better ensure that the licensed operator training program prevents similar results in the future.

Our ongoing root cause analysis utilizes a team of station personnel, industry peers and other industry representatives who are providing broad perspectives on what factors most likely led to the deficient results. The analysis includes a review of how well we implemented the V.C. Summer license training program and how well the administered examination complies with specific examination criteria provided in NUREG 1021. Although our root cause investigation is not yet complete, we have reached preliminary conclusions regarding why such a high percentage of our RO and SRO candidates apparently did not pass this written examination. These conclusions point to three potential primary areas of concern regarding this examination: (1) the audit examination process; (2) the examination content and structure; and (3) our validation of the written examination. All other areas of concern with the initial operator licensing program and the extent of condition of identified deficiencies will be addressed as part of the root cause evaluation.

In regard to the first area of concern, it does not appear that the audit examination process was rigorous enough to ensure our candidates' success. As previously noted, the root cause evaluation will address this issue in detail. In regard to the second and third areas of concern, it appears that: (1) the examination contained an unacceptable number of questions that do not satisfy NUREG 1021 guidelines from the perspective of question content and structure; (2) the examination appears to have excessively focused on memorization instead of cognitive capabilities; (3) an unacceptable number of questions did not test the intended Knowledge and Abilities ("KA") topic, and (4) there appears to have been an excessive number of SRO questions that do not address any of the examination content criteria in 10 CFR § 55.43(b). Regarding written examination validation, a large number of comments were provided during the examination development. However, our efforts fell short of addressing these issues in a manner that ensured a quality final product.

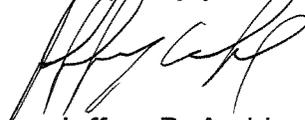
Enclosure 1 provides our general post-examination review results based primarily on a comparison of the administered exam to NUREG 1021, Appendix A, "Overview of Generic Examination Concepts," and Appendix B, "Written Examination Guidelines." Enclosure 2 provides NUREG 1021 Form ES-401-2, which compares the actual exam question scope to NUREG recommendations, and regulatory test item evaluations. We recognize that these attachments contain detailed information that SCE&G may be better able to explain during a meeting with your staff. We are available to review each conclusion in these enclosures at your staff's convenience.

SCE&G recognizes that we are ultimately responsible and accountable for ensuring that our operator candidates are ready for examination and as such, has begun implementation of corrective actions that enhance the quality of the operator licensing program and address associated performance deficiencies. We also note that SCE&G should have ensured better interaction with the NRC to improve the quality of this examination. However, in light of numerous questions that do not appear to test adequately the candidates in a manner directed by NUREG 1021, SCE&G requests the NRC to review our identified deficiencies in examination quality and determine whether this examination should be considered valid. Notwithstanding whether the NRC chooses to take this path, SCE&G will implement aggressive corrective actions that will better ensure that these pass/fail results will not occur again.

V. C. Summer will work with INPO and other industry representatives to address all of the issues that we identify in the root cause assessment. Upon completion of the root cause report, we would appreciate the opportunity to discuss our findings and corrective actions with you and/or your staff.

If you have any questions, please feel free to call me at (803) 345-4214.

Very truly yours,



Jeffrey B. Archie

CJM/JBA/mb
Enclosures

cc: (Without attachment unless noted)

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