August 21, 2008

Mr. Britt T. McKinney
Senior Vice-President & Chief Nuclear Officer
PPL Susquehanna, LLC
769 Salem Blvd. - NUCSB3
Berwick, PA 18603-0467

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 - REACTOR OPERATOR INITIAL LICENSING RETAKE EXAMINATION REPORT 05000387 and 0500388/2008302

Dear Mr. McKinney:

On May 16, 2008, the U.S. Nuclear Regulatory Commission (NRC) completed an initial retake licensing examination at the Susquehanna Steam Electric Station, Units 1 and 2. The enclosed report documents the examination findings, which were discussed on August 19, 2008, with Jeffrey Helsel, Training Manager.

The examination included the evaluation of three applicants for reactor operator licenses. The written examination was developed using NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 9, Supplement 1. The license examiners determined that two of three applicants satisfied the requirements of 10 CFR Part 55, and the appropriate licenses have been issued.

This report documents a Severity Level IV non-cited violation associated with your application submittal dated April 29, 2008, for a reactor operator license for an individual who was not medically qualified to hold a reactor operator license. The NRC is treating this violation as a non-cited violation consistent with Section VI.A.1 of the NRC Enforcement Policy because of the very low safety significance of the violation and because it is entered into your corrective action program. If you contest this non-cited violation, you should provide a response within 30 days of the date of this examination report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN.: Document Control Desk, Washington, DC 20555-0001; and the NRC Resident Inspector at the Susquehanna Steam Electric Station.

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) component 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/

Darrell J. Roberts
Deputy Director
Division of Reactor Safety

Docket Nos. 50-387; 50-388
License Nos. NPF-14, NPF-22

Enclosure:
NRC Examination Report 05000387/2008302 and 05000388/2008302

Room or from the Publicly Available Records (PARS) component 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/

Darrell J. Roberts
Deputy Director
Division of Reactor Safety

Docket Nos. 50-387; 50-388
License Nos. NPF-14, NPF-22

Enclosure:
NRC Examination Report 05000387/2008302 and 05000388/2008302

SUNSI Review Complete: _____JC_____ (Reviewer's Initials)
ADAMS PKG#ML080390056 **ADAMS ACC#ML082350178**
DOCUMENT NAME: T:\DRS\Operations Branch\CARUSO\Exam 08-Susq Rtk May 08 (U01762)\EXAM REPORT.doc
After declaring this document "An Official Agency Record" it will be released to the Public.
To receive a copy of this document, indicate in the box: "**C**" = Copy without attachment/enclosure "**E**" = Copy with attachment/enclosure "**N**" = No copy

OFFICE	RI/DRS		RI/DRS		RI/DRS					
NAME	CBixler/DS/CB		JCaruso/JC		DRoberts/DJR					
DATE	08/20/08		08/20/08		08/21/08					

OFFICIAL RECORD COPY

cc w/encl:
C. Gannon, Vice President, Nuclear Operations
R. Paley, General Manager, Plant Support
R. Pagodin, General Manager, Nuclear Engineering
M. Crowthers, Manager, Nuclear Regulatory Affairs
R. Smith, General Manager, Site Preparedness and Services
D. Brophy, Supervisor, Nuclear Regulatory Affairs
M. Rose, Manager, Quality Assurance
J. Scopelliti, Community Relations Manager
B. Snapp, Esq., Associate General Counsel, PPL Services Corporation
Supervisor, Document Control Services
R. Osborne, Allegheny Electric Cooperative, Inc.
D. Allard, Director, PA Dept of Environmental Protection
Board of Supervisors, Salem Township
J. Johnsrud, National Energy Committee, Sierra Club
E. Epstein, TMI-Alert (TMIA)
J. Powers, Dir, PA Office of Homeland Security
R. French, Dir, PA Emergency Management Agency
J. Helsel, Training Manager

Distribution w/encl: (via e-mail)
S. Collins, RA
M. Dapas, DRA
M. Gamberoni, DRS
D. Roberts, DRS
S. Hansell, DRS
J. Caruso, DRS
D. Lew, DRP
J. Clifford, DRP
P. Krohn, DRP
R. Fuhrmeister, DRP
T. Setzer, DRP
F. Jaxheimer, DRP – Sr. RI, Susquehanna
A. Rosebrook, DRP, Actg RI, Susquehanna
S. Farrell, DRP – OA, Susquehanna
S. Williams, RI OEDO
R. Nelson, NRR
M. Kowal, NRR
J. Kim, NRR
B. Vaidya, NRR, PM
J. Hughey, Backup, NRR
S. Glenn, INPO (GlennSG@Inpo.org)
ROPreports@nrc.gov

Distribution w/encl:
DRS Master Exam File (C. Bixler) (w/concurrences)
DRS File

EXAMINATION REPORT

U.S. NUCLEAR REGULATORY COMMISSION

REGION I

Dockets:	50-387, 50-388
Licenses:	NPF-14, NPF-22
Report :	05000387/2008302; 05000388/2008302
Licensee:	PPL Susquehanna, LLC
Facility:	Susquehanna Steam Electric Station, Units 1 and 2
Location:	769 Salem Blvd. - NUCSB3 Berwick, PA 18603-0467
Dates:	May 16, 2008 (Written Retake Examination Administration) May 25 - June 20, 2008 (NRC Examination Grading) June 19, 2008 (Licensee Submitted Complete Post Exam Package) July 14, 2008 (Licensee Submitted Letter Withdrawing License Application)
Inspectors:	John Caruso, Chief Examiner, Operations Branch
Approved By:	Darrell J. Roberts Deputy Director Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

ER 05000387/2008302; 05000388/2008302; May 16, 2008; Susquehanna Steam Electric Station, Units 1 and 2; Initial Reactor Operator Licensing Retake Examination Report.

One NRC examiner evaluated the competency of three applicants for reactor operator licenses at the Susquehanna Steam Electric Station, Units 1 and 2. Pennsylvania Power & Light (PPL) developed the examination using NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 9, Supplement 1. The written examination was administered by PPL on May 16, 2008. During the post-examination grading period, the NRC determined that one of the applicants was not medically qualified. Subsequent discussions between NRC Region I and the PPL staff resulted in PPL requesting that this application be withdrawn and not processed. The license examiner determined that the two remaining applicants satisfied the requirements of 10 CFR Part 55, and the appropriate licenses were issued. One Level IV non-cited violation was identified related to the accuracy of a license application.

A. NRC-Identified and Self-Revealing Findings

Cornerstone: Mitigating Systems

Severity Level IV: The NRC identified a Level IV non-cited violation of 10 CFR 50.9, “Completeness and Accuracy of Information” because PPL submitted a license application for a reactor operator to take an initial NRC license examination that incorrectly stated that the applicant was medically qualified with restrictions. The performance was reviewed for any cross cutting aspects and none were identified.

This finding was more than minor because it impacted the NRC’s ability to perform its regulatory function and was therefore evaluated using the traditional enforcement process. Specifically, PPL submitted a license application for a reactor operator to take an NRC license examination that incorrectly stated that the applicant was medically qualified with restrictions. This information could have resulted in an operator being licensed that was not medically qualified. The finding is of very low significance because it did not result in the NRC making an incorrect licensing decision and PPL took adequate corrective actions and on July 14, 2008 requested withdrawal of this reactor operator license application. (Section 4OA5)

B. Licensee-Identified Violations

None.

REPORT DETAILS

4. OTHER ACTIVITIES (OA)

4OA5 Other Activities (Initial Reactor Operator Licensing Retake Examination)

.1 License Applications

a. Scope

The examiners reviewed the license applications submitted by the licensee to ensure the application reflected that each applicant satisfied relevant license eligibility requirements. The applications were submitted on NRC Form 398, "Personal Qualification Statement," and NRC Form 396, "Certification of Medical Examination by Facility Licensee."

b. Findings

Failure to Provide Complete and Accurate NRC License Application

Introduction: The NRC identified a Severity Level IV non-cited violation of 10 CFR 50.9, "Completeness and Accuracy of Information" because PPL submitted a license application for a reactor operator to take an initial NRC license examination that incorrectly stated the applicant was medically qualified with restrictions.

Description: NRC requirements relating to the submission of complete and accurate information are contained in 10 CFR 50.9, "Completeness and Accuracy of Information". Specifically, Section 50.9(a) requires the licensee to submit and maintain information that is both accurate and complete in all material respects. On November 15, 2007, PPL submitted an NRC Form 398, "Personal Qualification Statement" (hereinafter referred to as a *license application*), and NRC Form 396, "Certification of Medical Examination By Facility Licensee" for one of the reactor operator applicants scheduled to be examined in December 2007. The Form 396 indicated that the individual was medically qualified with some restrictions. The applicant subsequently failed the written portion of the NRC license examination administered in December 2007, and was denied an operator's license based on written exam performance.

On April 29, 2008, PPL submitted a second license application for this same applicant to retake an NRC initial license examination. The license application requested a waiver for the license medical examination since more than six months had passed between the date the license medical examination had been performed and the anticipated date of licensing (NUREG 1021, ES-202, C.1.a). The Form 398 license application stated in Block 17 Comments, that there were no changes in the applicant's medical conditions from his last application. On May 2, 2008, the NRC requested that PPL provide an update on the applicant's medical history. Note: After the NRC Medical Doctor's review of the first application submitted November 16, 2007, he required a medical update be provided to the NRC 90 days after licensing. For the April 29 application, the NRC staff requested the 90 day update be provided because more than 90 days had passed from the time the applicant would have been licensed had he passed his examination the first time.

On May 13, 2008, PPL submitted an updated NRC Form 396, “Certification of Medical Examination by Facility Licensee” and provided an explanation and attached supporting medical evidence for the NRC to review. This updated form indicated the individual was medically qualified with some restrictions. On May 15, 2008, the NRC granted a waiver to the applicant in order for him to retake his NRC license examination. The granting of this waiver was based on statements made in the Form 398 license application indicating that there were no changes in the applicant’s medical conditions from his last application as well as his updated Form 396 indicating that the individual was still medically qualified with some restrictions.

The applicant’s Form 396 and attached updated medical history were then forwarded by the NRC regional office to the NRC’s Medical Doctor for independent review. The NRC’s Medical Doctor conducted an independent review of the applicant’s medical history and records and, on May 30, 2008, determined that the applicant was not medically qualified in accordance with American Nuclear Society, ANSI/ANS 3.4-1983, "Medical Certification and Monitoring of Personnel Requiring Operator Licenses for Nuclear Power Plants." On May 30, 2008, the NRC Doctor also contacted PPL’s Site Medical Doctor and informed him that the applicant was not medically qualified. On June 3, 2008, the Operations Manager/Acting Training Director was notified by telephone by the NRC Region I Acting Operations Branch Chief that the applicant was not medically qualified to hold an NRC operating license.

On June 4, 2008, PPL generated a Condition Report (CR) 1036701 documenting this concern and on June 26, 2008, PPL issued CR 1044412 that initiated an extent of condition review of the medical qualifications of all currently licensed operators. On June 4, 2008, the Operations Manager/Acting Training Director contacted the NRC Region I Acting Operations Branch Chief and requested more time for PPL to independently evaluate the issue and to consider whether it would be prudent to have the applicant undergo additional testing and evaluation, and then provide this additional information for NRC staff consideration. On July 14, 2008, the NRC received a letter from PPL requesting withdrawal of this license application.

Analysis: This finding was more than minor because it was a non-willful compromise of an application required by 10 CFR 55 in which the inaccurate information could have led to a license being issued to a medically unqualified individual. Also, this issue impacted the NRC’s ability to perform its regulatory function and was therefore evaluated using the traditional enforcement process. Specifically, PPL submitted a license application for a reactor operator to take NRC license examination that incorrectly stated that the applicant was medically qualified with restrictions. PPL failed to meet a standard (in that they did not properly assess the medical qualification of a license applicant in accordance with ANSI/ANS 3.4-1983, "Medical Certification and Monitoring of Personnel Requiring Operator Licenses for Nuclear Power Plants") where the cause was reasonably within the licensee's ability to foresee and correct and which should have been prevented. This information could have resulted in an operator being licensed that was not medically qualified.

The finding is of very low safety significance because it did not result in the NRC making an incorrect licensing decision since the NRC discovered the disqualifying condition prior to completing the licensee’s request to grant a reactor operator license to the individual. The performance was reviewed for any cross cutting aspects and none were identified. NRC‘s review of the issue determined the finding to be a Severity Level IV violation

consistent with the Enforcement Policy Supplement I, "Reactor Operations," example D.3, "A failure to meet regulatory requirements that have more than minor safety or environmental significance" and Supplement VII, "Miscellaneous Matters", example D.1, "Incomplete or inaccurate information that is provided to the NRC but not amounting to a Severity Level I, II, or III violation." This violation was not considered to be more significant than Severity Level IV because the condition was identified and precluded issuance of the license.

Enforcement: 10 CFR 50.9 requires, in part, that, "Information provided to the Commission by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the licensee shall be complete and accurate in all material respects." Contrary to the requirement, on April 29, 2008, PPL submitted a reactor operator license application that was not complete and accurate in all material respects. Specifically, the application indicated the individual was medically qualified with restrictions, however, the NRC determined that the individual was not medically qualified based on the information available to the licensee prior to making its submittal. Because this violation was of very low safety significance and has been entered into the licensee's corrective action program (1036701, 1044412), this violation is being treated as a Severity Level IV NCV consistent with Section VI.A.1 of the NRC Enforcement Policy.
(NCV 05000387/ 2008302-01; 05000388/2008302-01 – Failure to Provide Complete and Accurate NRC License Application)

.2 Operator Knowledge and Performance

a. Scope

On May 16, 2008, PPL proctored the administration of the written examinations to the applicants. PPL graded the written examination, analyzed the results, and presented their analysis to the NRC on May 22, 2008 and on June 19, 2008 submitted a post exam comment.

b. Findings

All three Reactor Operator applicants passed the examination. Two of the three applicants satisfied all requirements of 10 CFR Part 55, and the appropriate licenses were issued on June 20, 2008, During the post-examination grading period, the NRC determined that one of the applicants was not medically qualified. Subsequent discussions between NRC Region I and the PPL staff resulted in PPL requesting that this application be withdrawn and not processed

The text of the examination questions, the licensee's examination analysis, and the licensee's post-examination comments may be accessed in the ADAMS system under the accession numbers noted in the attachment.

Chapter ES-403 and Form ES-403-1 of NUREG 1021 require the licensee to analyze the validity of any written examination questions that were missed by half or more of the applicants. The licensee conducted this performance analysis for seven questions that met this criterion and submitted the analysis to the chief examiner. This analysis concluded that one of the questions (exam question #2) was technically incorrect and

required an answer key change. The remaining questions were determined to be generic knowledge weaknesses to be addressed through the facility corrective action program.

The licensee's recommendations and the NRC responses follow:

Reactor Operator Question 2

The licensee recommended changing the answer for this question. The stem of the question postulates an automatic High Pressure Coolant Injection system (HPCI) start on low level, which is subsequently reset. The question then asks how the aux oil pump will respond if HPCI is placed in manual and speed reduced to zero. The original correct answer "d" was that the aux oil pump would not start. Review of logic diagrams shows that the aux oil pump has a "seal-in" feature that maintains the availability of low pressure auto start until the control switch is taken out of "auto". The new correct answer should be "c", which states the correct response.

NRC Response: The NRC agrees with the licensee's recommendation. The examiner reviewed the logic prints and detailed explanation provided by the licensee, and determined the explanation was correct. Note: This change did not affect a licensing decision for this exam.

.3 Initial Reactor Operator Licensing Retake Examination Development

a. Scope

PPL developed the examination in accordance with NUREG-1021, Revision 9, Supplement 1. All PPL facility training and operations staff involved in examination preparation and validation were listed on a security agreement. PPL submitted the written examination outlines on February 16, 2008. The chief examiner reviewed the outlines against the requirements of NUREG-1021, Revision 9, Supplement 1, and provided comments to the licensee. PPL submitted the draft examination package on April 16, 2008. The chief examiner reviewed the draft examination package against the requirements of NUREG-1021, Revision 9, Supplement 1, and provided comments to the licensee on the examination on April 28, 2008. PPL satisfactorily completed comment resolution on May 2, 2008.

b. Findings

No findings of significance were identified.

4OA6 Meetings, Including Exit

On June 20, 2008, the chief examiner in a telephone conversation with Mr. Ronald Fry, Supervisor of Operations Training presented the examination results which included providing license numbers for the two applicants that had passed the examination and satisfied all requirements for licensing. On July 14, 2008, the NRC received a letter from PPL requesting withdrawal of the license application for the third applicant who had been determined to be not medically qualified. On August 19, 2008, the chief examiner presented the final examination results in a telephone conversation with Mr. Jeffrey Helsel, Training Manager. The licensee acknowledged the findings presented.

The licensee did not identify any information or materials used during the examination as proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

ATTACHMENT

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

J. Helsel, Operations Training Manager
R. Fry, Operations Training Manager
C. Michales, Examination Developer

NRC Personnel

J. Caruso, Chief Examiner

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

05000387/2008302-01	NCV Failure to Provide Complete and Accurate NRC License Application (Section 4OA5)
05000388/2008302-01	NCV Failure to Provide Complete and Accurate NRC License Application (Section 4OA5)

Closed

NONE

Discussed

NONE

ADAMS DOCUMENTS REFERENCED

Accession No. ML081770487 – FINAL-Written Examination – publically available
Accession No. ML081770291 – FINAL-Post Examination Comments – publically available