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Bruce A. Boger, Director  
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Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

50-284

July 15, 1993

Dear Mr. Boger:

After reviewing the NRC's results of the investigation of my concerns about the conduct of the reactor operator's examinations, I conclude that the report you sent to me dated June 24, 1993 is incomplete and inaccurate.

Any unbiased reader of the report would become quite suspicious to discover that the investigators never interviewed me. This omission is highly questionable since I was the Reactor Supervisor, I had a specific complaint, and most important, I was the individual that initiated the investigation. There is an obvious error that should have never been made initially and should have never cleared subsequent reviews.

Had the interviewers talked to me, they would have had a detailed description of the event where the contract examiner accused me of passing answers to a license candidate. The accusation by the contract examiner was made not because of the verbal commands that were required of me as the Senior Reactor Operator on Duty. The accusation was made after a very long period of silence during operation when the only visible signs of life that I exhibited was my foot moving and an occasional blink of my eyes. This, he ridiculously assumed was passing "yes" and "no" answers to the candidate. This description of this event is not to be found in the report that you sent to me.

Another problem is the implication that I observed all of the events that the candidates reported to me. The report states in paragraph 3. "You also stated that the contract examiner was belligerent during the operating test, ..." At no time during any of our conversations did I make that exact claim. Over the telephone, I reported only what was reported to me. I was verbally passing the complaints to the NRC and acting only as a mouth piece for the candidates. Since I was Senior Operator on Duty for a fraction of the candidates who had complaints, this should have been obvious from the examination reports and the operations log. To be accurate, your report should have stated, "You also stated that the candidates reported that the contract examiner was belligerent during the operating test, ..." This same type of inaccuracy appears several more times throughout the report.

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The report inaccurately implies that I indicated that all of the candidates had been called names by the contract examiner. The report states, "The ISU candidates were individually asked if they were called names and they stated that they were not." This statement and its implication is not true since only one specific instance, which you clearly recognize, was reported to you. Whether the contract examiner made the statement humorously or not, the statement is unprofessional and has no place in a nuclear reactor operator license exam. I also believe that had the candidate been appropriately questioned, the candidate's response to his claim would have been different.

You state that "the meeting was not prearranged" between the ISU Office Assistant and the contract examiner. This claim was never made by me or anyone else at ISU. The chance meeting of the two individuals was never questioned by anyone because these occurrences do happen in this small community. However, the topic of conversation was the primary objection as you recognize.

The next issue is the length of the oral exams. The report claims, "... you stated that operating tests were too long in that they lasted four hours instead of two, which you believed to be more appropriate." A more accurate description of my complaint would be "Since past examinations in this facility have been approximately two hours as experienced by me and reported by others, and since most, if not all, examinations on facilities far more complicated last approximately two hours according to my experience, and since few, if any, breaks were involved in the oral examination procedures as I observed, and since any candidate would have difficulty remembering their name after a strenuous and tense two hours of simultaneous operation and questioning as I have experienced and observed, and since operators are never required to operate the reactor under examination conditions for more than a few minutes, then the I thought 3.5 - 4 hours of oral examination was a concern which may have effected the outcome of the examination." To date, I have not seen an evaluation of oral exam time length and its effect on the rate of pass/fail. Also, I have not seen a written comparison of oral exam lengths for the various facilities, examiners, and times, with an evaluation of trends. The length of time for the oral examination, therefore, is an uncontrolled parameter which may be used, knowingly or unknowingly, by the examiner to manipulate the outcome. However, I do understand the requirements for the oral examination and sympathize with the examiners for the difficulty this presents.

And finally, I will address the maintenance activity questions. This problem would be simply solved in 5 minutes, by converting long standing verbal orders, to a simple operations memo circulated to all of the candidates and licensed operators and provided to the NRC. I do recognize the examiners cannot possibly be aware of verbal orders, or even written procedures that are not provided to

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the NRC. Documentation at ISU is a horrible mess, as the next inspection of this facility should illuminate. However, since I have resigned the position of Reactor Supervisor and terminated my Senior Operator's License, I am no longer in a position to help either you or the facility with this perennial problem.

I will appreciate the update of the files on this matter. Perhaps all future investigations will require contact with the individual who initiates the investigation. I think that a different format for the investigation would also provide more accurate detailing of the events. Also, since the conduct of the investigation and the report were suspicious, I am providing a copy of this letter as well as your report to the Office of Special Counsel. Any further questions on this matter can be directed to me at 208-236-3125. I would like to see the final outcome of this matter after these corrections have been incorporated.

Sincerely,

  
Kevan Crawford, Ph.D.  
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