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April 28, 1989  
Indian Point Unit #2

Mr. Robert Gallo, Division Director  
Division of Reactor Safety  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Dear Mr. Gallo:

This letter is submitted in response to your telephone conversation with Mr. Frank Inzirillo of my staff requesting a self-evaluation of our Regualification Program. This evaluation is based on the results of the regualification examination administered by the NRC during the week of February 6, 1989.

Examiner Standard 601, entitled "Administration of Regualification Program Evaluations", section C.3.b, establishes the criteria for a satisfactory regualification program. We have compared the results of our examination to this criteria and have found our program to be satisfactory.

This self-evaluation is based on the following:

1. Criteria C.3.b(1)(a): Satisfactory

Based on verbal results provided by NRC there was 100% pass/fail decision agreement between NRC and facility grading of the written and operating examinations. (Criteria: 90%)

2. Criteria C.3.b.(1)(b): Satisfactory

Of the twelve licensed operators examined, ten (83.3%) passed the examination. (Criteria: 75%)

3. Criteria D.1.C.(2)(c): Satisfactory

- o Based on verbal results provided by NRC there were no situations where the NRC found crew performance unsatisfactory and the facility did not. (Criteria: 100% agreement)
- o Based on verbal results provided by NRC there was 100% agreement between NRC and facility on individual simulator evaluation. (Criteria: 90%)

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- o One out of three crews were found unsatisfactory. (Criteria: no more than 1/3 unsatisfactory)
- 4. Criteria C.3.b.(1)(d): Satisfactory  
  
Based on a thorough review of our program content, the requirements of 10 CFR 55.59 (c)(2), (3), and (4) are satisfied.
- 5. The following additional criteria were reviewed in accordance with paragraph C.3.b.(2) and found to be satisfactory.
  - o The same common Job Performance Measure (JPM) was missed by no more than 25% of the examinees. (Criteria: 50%)
  - o The same question about the same common JPM (worst case JPM #4) was missed by 40% of examinees. (Criteria: <50%)
  - o Examinees were evaluated in all positions permitted by their individual licenses.
  - o Licensed Operators were trained on in-plant tasks covered in JPMS during Requalification Training in 1988.
  - o 100% of the examinees received greater than an 80% grade on the JPM questions. (Criteria: at least 75% of examinees received greater than 80%)
  - o Based on verbal results provided by NRC all facility evaluators were determined to be satisfactory.

In addition to reviewing the criteria established in Examiner Standard 601, areas of strengths and areas which would benefit from improvements have been identified as a result of this process. They are:

Strengths:

- o The development process which included significant support from Operations resulted in well designed JPMS.

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- o Classroom seminars and in the field practice on techniques for administering JPM and simulator evaluations resulted in the administration of a fair and consistent examination.

Areas for Improvement

- o Simulator Scenarios need to contain more individual component failures to facilitate objective evaluation of operator actions.
- o A review of the requalification exam results identified areas where additional training would be beneficial. These areas will be incorporated into our requalification program.

In summary, we feel that the new examination process has been extremely beneficial to our requalification program. If you have any questions, please contact Mr. Frank Inzirillo of my staff (914-526-5134).

Very truly yours,



Mr. Robert Gallo  
U.S. Nuclear Regulatory Commission April 28, 1989

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