

Docket No. C50-247

MAR 5 1991

Consolidated Edison Company of
New York, Inc.
ATTN: Mr. Stephen Bram
Vice President, Nuclear Power
Indian Point Station
Broadway and Bleakley Avenues
Buchanan, New York 10511

Dear Mr. Bram:

SUBJECT: SIMULATOR EXAMINATION CREW SIZE

I am responding to a telephone discussion on February 28, 1991, between Mr. Frank Inzirillo of your staff and Mr. J. Prell of my staff regarding the complement of candidates for simulator examinations administered as part of the initial licensing process. We understand that you desire to have the candidates evaluated in a normal Technical Specification configuration of two senior operators (SRO) and two reactor operators (RO). In the past (and as planned for the March 12, 1991 examinations), we normally evaluate a three person crew in the simulator.

The primary reason for evaluating three candidates at a time in the dynamic simulator examination is that the initial license examination is focused exclusively on evaluating the individual's knowledge, skills, and abilities to perform licensed duties on the subject plant. Unlike the requalification program, there is neither crew evaluation nor training program evaluation being simultaneously performed. It is our objective to evaluate an individual taking an initial license examination with the minimum shift manning allowed by the technical specifications. At Indian Point Unit 2, this would be the one required SRO in the control room, even though two SROs are required on shift and the two ROs required in the control room during startup and planned shut-downs. This allows us to make a licensing decision based on the most limiting licensed personnel constraints possible, thus making our decision on the basis of the individual's performance of licensed duties.

Once operators are licensed, we expect that they are promptly enrolled in the facility's requalification program. It is there that crew training and evaluation should be further developed from the initial license training, as an operator may now train with his assigned crew. That is why crew evaluation is a segment of the NRC's requalification program evaluation.

Further, we are interested in evaluating the execution of the Emergency Operating Procedures on an initial examination. An SRO must be able to control plant activities through the use of the Emergency Operating Procedures without the

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oversight assistance from an additional licensed individual. If the SRO candidate cannot demonstrate this ability, then this individual is not ready for an SRO license.

We and the Operator Licensing Branch at NRC Headquarters understand your position on this matter, but we continue to support three man crew evaluations as the most effective and conservative approach to take in making an initial licensing decision. If you have concerns over our examination methodology, you are encouraged to work through NUMARC and its representatives on this matter.

If you have any questions regarding this issue, please contact me at 215-337-5291 or Jim Prell at 215-337-5108.

Sincerely,

Original Signed By:

Lee H. Bettenhausen, Chief
Operations Branch
Division of Reactor Safety

cc:

C. Jackson, Manager, Regulatory Affairs
B. Brandenburg, Assistant General Counsel
P. Kokolakis, Director, Nuclear Licensing
Department of Public Service, State of New York
State of New York, Department of Law
W. Stein, Secretary - NFSC
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of New York, SLO Designee

Power Authority of the State of
New York

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bcc:

Region I Docket Room (with concurrences)

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J. Caldwell, EDO

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