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 STEINHARDT, C.R. Wisconsin Public Service Corp.
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SUBJECT: Forwards response to concerns identified during 890501-05 requalification exam.

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 TITLE: Operator Requalification Program

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WISCONSIN PUBLIC SERVICE CORPORATION

600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

July 6, 1989

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Requalification Examination Report

Reference: 1) "Requalification Examination Report" from H. J. Miller (US NRC)
to D. C. Hintz (WPSC) dated June 2, 1989

Pursuant to your request in reference 1, the attachment provides a response to the three (3) items of concern identified during the May 1-5, 1989 requalification exam administration. Included in the response is our evaluation of the issues and our proposed corrective actions.

If further information or clarification is required, please feel free to contact C. S. Smoker or R. F. Zube of my staff.

Sincerely,

C. R. Steinhardt
Assistant Vice President-Nuclear Power

CSS/jms

Attach.

cc - Mr. Robert Nelson, US NRC
US NRC, Region III

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Attachment

To

Letter from C. R. Steinhardt (WPSC) to NRC Document Control Desk

Dated

July 6, 1989

NRC Concern #1

"First is our concern about Wisconsin Public Service Corporation's commitment to the new requalification program."

WPSC Response

WPSC is committed fully to this new requalification program as evidenced by the effort and resources expended to establish a satisfactory program:

- ° More than 12,600 man-hours (6 man-years) were spent on the development of the requalification exam bank since fall of 1988.
- ° In spite of our concerns about not meeting our goal of 300 open reference questions, which was 40% greater than the NUMARC agreement of 30 per month, WPSC did submit 154 Part A questions and 105 Part B questions by March 2, 1989. As stated in the referenced examination report, NRC was able to construct the Part A and B written examinations entirely from facility supplied questions.
- ° During the initial review of the questions by NRC, there were questions that NRC considered as single-reference "lookup" type questions, and therefore unacceptable. WPSC took aggressive action to develop multiple-reference type questions and as stated in the referenced examination report, the percentage of single-reference lookup type questions was reduced to essentially zero.

These examples of prompt and effective response to NRC concerns about the Kewaunee requalification program demonstrate the individual, departmental, and corporate commitment to a satisfactory operator requalification program.

NRC Concern #2

"We also have a concern regarding the objectivity of grading and evaluation of the examination."

WPSC Response

We believe that the lack of WPSC familiarity and experience with the NRC's new operator requalification process is the basis for the NRC concern regarding exam grading and evaluation objectivity. Identified answer key improvements will be implemented prior to the next requalification exam:

- ° Additional, identified acceptable answers will be added to the answer key.
- ° Partial credit guidance for multiple part answers will be given in the answer key.
- ° Setpoint requirements will be clearly indicated in the answer key.

Also, grading policies will be determined, in cooperation with the NRC exam team, in advance of the examination.

NRC Concern #3

"A third concern involves the process Kewaunee chose to administer the examination for security purposes. While the process did provide for examination security, the amount of time spent administering the exam was excessive."

"The limited number of sets of reference materials...led to scheduling difficulties during the JPM and written portions of the examinations."

WPSC Response

While the zone evaluation method may enhance exam security, this method was chosen primarily because of the limited number of available, qualified

July 6, 1989

evaluators. This examination administration method will be re-evaluated prior to the next requalification exam. The process will be revised in order to provide for a more expeditious exam administration.

The number of sets of reference materials will be increased to allow for conducting both portions of the written exam at the same time.