

# UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION III 2443 WARRENVILLE ROAD, SUITE 210 LISLE, IL 60532-4352

October 12, 2012

Mr. Michael J. Pacilio Senior Vice President, Exelon Generation Company, LLC President and Chief Nuclear Officer, Exelon Nuclear 4300 Winfield Road Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3;

NRC INITIAL LICENSE EXAMINATION REPORT 05000237/2012301;

05000249/2012301

Dear Mr. Pacilio:

On August 27, 2012, the U.S. Nuclear Regulatory Commission (NRC) completed the initial operator licensing examination process for license applicants employed at your Dresden Nuclear Power Station. The enclosed report documents the results of those examinations. Preliminary observations noted during the examination process were discussed on August 14, 2012, with Mr. D. Czufin and other members of your staff. An exit meeting was conducted by telephone on September 25, 2012, between Mr. P. DiGiovanna of your staff and Mr. D. Reeser, Chief Operator Licensing Examiner, to review the proposed final grading of the written examination for the license applicants. During the telephone conversation, NRC resolutions of the station's post-examination comments, initially received by the NRC on August 27, 2012, were discussed.

The NRC examiners administered an initial license examination operating test during the weeks of August 6 and August 13, 2012. The written examination was administered by Dresden Nuclear Power Station Training Department personnel on August 17, 2012. Four Senior Reactor Operator and six Reactor Operator (RO) applicants were administered license examinations. The results of the examinations were finalized on September 26, 2012. Two RO applicants failed one or more sections of the administered examination and were issued proposed license denial letters. Eight applicants passed all sections of their respective examinations and four were issued senior operator licenses and one was issued an operator license. The license for one RO applicant is being withheld pending written certification that the applicant has completed the on-the-job training requirements of the Initial Licensed Operator Training Program. In accordance with NRC policy, the licenses for two RO applicants are being withheld pending the outcome of any written examination appeal that may be initiated.

The written examination and other related written examination documentation will be withheld from public disclosure for 24 months per your request. However, if an applicant received a proposed license denial letter because of a written examination grade that is less than 80 percent, the applicant will be provided a copy of the written examination. For examination

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security purposes, your staff should consider that written examination is uncontrolled and exposed to the public.

In accordance with Title 10 of the Code of Federal Regulations, Section 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Website at <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a> (the Public Electronic Reading Room).

Sincerely,

/RA/ By Dell R. McNeil Acting For/

Hironori Peterson, Chief Operations Branch Division of Reactor Safety

Docket Nos. 50-237, 50-249; 72-037 License Nos. DPR-19; DPR-25

#### **Enclosures:**

- Operator Licensing Examination Report 05000237/2012301;
   05000249/2012301 w/Attachment: Supplemental Information
- 2. Simulation Facility Report

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## U.S. NUCLEAR REGULATORY COMMISSION

## **REGION III**

Docket Nos: 05000237; 05000249 License Nos: DPR-19; DPR-25

Report No: 05000237/2012301; 05000249/2012301

Licensee: Exelon Generation Company, LLC

Facility: Dresden Nuclear Power Station, Units 2 and 3

Location: Morris, IL

Dates: August 6 through 27, 2012

Inspectors: D. Reeser, Chief Examiner

M. Bielby, Examiner P. Young, Examiner

Approved by: H. Peterson, Chief

**Operations Branch** 

Division of Reactor Safety

## **SUMMARY OF FINDINGS**

ER 05000237/2012301; 05000249/2012301; 08/06/2012 – 08/27/2012; Exelon Generation Company, LLC; Dresden Nuclear Power Station, Units 2 and 3; Initial License Examination Report.

The announced initial operator licensing examination was conducted by regional U.S. Nuclear Regulatory Commission (NRC) examiners in accordance with the guidance of NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 9, Supplement 1.

## **Examination Summary**

Eight of ten applicants passed all sections of their respective examinations. Four applicants were issued senior operator licenses and one applicant was issued an operator license. Two applicants failed one or more sections of the administered examination and were issued proposed license denials. The license for one Reactor Operator (RO) applicant is being withheld pending written certification that the applicant has completed the required on-the-job training requirements of the Initial Licensed Operator Training Program. The licenses for two RO applicants are being held and may be issued pending the outcome of any written examination appeal. (Section 4OA5.1).

## **REPORT DETAILS**

## 4OA5 Other Activities

## .1 Initial Licensing Examinations

## a. Examination Scope

The NRC examiners and members of the facility licensee's staff used the guidance prescribed in NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 9, Supplement 1, to develop, validate, administer, and grade the written examination and operating test. Members of the facility licensee's staff prepared the outline and developed the written examination and operating test. The NRC examiners validated the proposed examination during the week of July 16, 2012, with the assistance of members of the facility licensee's staff. During the on-site validation week, the examiners audited one license application for accuracy. The NRC examiners, with the assistance of members of the facility licensee's staff, administered the operating test, consisting of job performance measures and dynamic simulator scenarios, during the period of August 6 through 14, 2012. The facility licensee administered the written examination on August 17, 2012.

#### b. Findings

## (1) Written Examination

The NRC examiners determined that the written examination, as proposed by the licensee, was within the range of acceptability expected for a proposed examination. Less than 20 percent of the proposed examination questions were determined to be unsatisfactory and required modification or replacement. All changes made to the proposed written examination were made in accordance with NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," and documented on Form ES-401-9, "Written Examination Review Worksheet," which will be available in 24 months electronically in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS).

On August 27, 2012, the licensee submitted documentation noting that there were six post-examination comments for consideration by the NRC examiners when grading the written examination. The post-examination comments and the NRC resolution for the post-examination comments, as well as the final as-administered examination and answer key (ADAMS Accession Number ML12283A450), will be available in 24 months electronically in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS.

The NRC examiners graded the written examination on September 26, 2012, and conducted a review of each missed question to determine the accuracy and validity of the examination questions.

## (2) Operating Test

The NRC examiners determined that the operating test, as originally proposed by the licensee, was within the range of acceptability expected for a proposed examination.

During the validation of the operating test, several Job Performance Measures (JPMs) were modified. An administrative JPM for Reactor Operator (RO) applicants related to work hour limitations was revised to increase the level of difficulty so that the applicants were required to address the requirements needed to work beyond the prescribed work hour limits, after determining that the limits would be exceeded. The grading standard for a Senior Reactor Operator (SRO) administrative JPM had to be corrected to remove an incorrect Technical Specification action requirement. Several control room/in-plant systems JPMs required changes to the identification of critical steps (changes from noncritical to critical and vice versa). The cues in several JPMs were revised to require the applicant to earn the specified information rather than to simply supply the information at a predefined moment. During validation, one of the dynamic simulator scenarios was identified as being overly simplistic and was replaced by the more challenging previously identified spare scenario. Although the number of operating test items determined to be unsatisfactory did not exceed 20 percent of the total number of operating test items submitted, and was, therefore, within the range of acceptability, the number and type of changes made indicate that additional attention in this area was warranted. Changes made to the operating test are documented in a document titled, "Operating Test Comments." That document as well as the final as-administered dynamic simulator scenarios and JPMs are available electronically in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS.

The NRC examiners completed operating test grading on August 14, 2012.

#### (3) Examination Results

Four applicants at the SRO level and six applicants at the RO level were administered written examinations and operating tests. Five applicants passed all portions of their examinations and were issued their respective operating licenses. Two applicants failed one or more sections of the administered examination and were issued proposed license denials. One applicant passed all portions of the license examination, but the applicant's license is being withheld pending written certification that the applicant has completed the on-the-job training requirements of the Initial Licensed Operator Training Program. Two applicants passed all portions of the license examination, but received a written test grade less than or equal to 82 percent. In accordance with NRC policy, the applicants' licenses will be withheld until any written examination appeal possibilities by other applicants have been resolved. If the applicant's grade is still equal to or greater than 80 percent after any appeal resolution, the applicant will be issued an operating license. If the applicant's grade has declined below 80 percent, the applicant will be issued a proposed license denial letter and offered the opportunity to appeal any questions the applicant feels were graded incorrectly.

## .2 Examination Security

## a. Scope

The NRC examiners reviewed and observed the licensee's implementation of examination security requirements during the examination validation and administration to assure compliance with Title10 of the Code of Federal Regulations, Section 55.49, "Integrity of Examinations and Tests." The examiners used the guidelines provided in NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," to determine acceptability of the licensee's examination security activities.

## b. Findings

No findings were identified.

## 4OA6 Management Meetings

## .1 Debrief

The Chief Examiner presented the examination team's preliminary observations and findings on August 14, 2012, to Mr. D. Czufin, Site Vice President and other members of the Dresden Nuclear Power Station Operations and Training Department staff.

# .2 Exit Meeting

The Chief Examiner conducted an exit meeting on September 25, 2012, with Mr. P. DiGiovanna, Training Director, by telephone. The NRC's final disposition of the station's post-examination comments were disclosed and discussed with Mr. DiGiovanna during the telephone discussion. The examiners asked the licensee whether any of the material used to develop or administer the examination should be considered proprietary. No proprietary or sensitive information was identified during the examination or debrief/exit meetings.

ATTACHMENT: SUPPLEMENTAL INFORMATION

## SUPPLEMENTAL INFORMATION

## **KEY POINTS OF CONTACT**

## Licensee

- D. Czufin, Site Vice President
- G. Graff, Nuclear Oversight Manager
- H. Dodd, Regulator Assurance Manager
- P. DiGiovanna, Training Director
- M. Otten, Operations Training Manager
- J. Nelson, ILT Examination Coordinator
- M. Schimanski, ILT Lead Instructor
- G. Morrow, Senior Operations Supervisor
- T. Ditchfield, Shift Manager/Facility Representative

## **Nuclear Regulatory Commission**

- G. Roach, Senior Resident Inspector
- D. Melendez, Resident Inspector
- D. Reeser, Chief Examiner
- M. Bielby, Examiner
- P. Young, Examiner

## LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

1

## Opened/Closed

None

## LIST OF ACRONYMS USED

ADAMS Agencywide Document Access and Management System

CFR Code of Federal Regulations
DRS Division of Reactor Safety
JPM Job Performance Measure

MMI Minor Maintenance Item (Simulator)
NRC U.S. Nuclear Regulatory Commission
PARS Publicly Available Records System

RO Reactor Operator

SRO Senior Reactor Operator

2 Attachment

## SIMULATION FACILITY REPORT

Facility Licensee: Dresden Nuclear Power Station, Units 2 and 3

Facility Docket Nos: 05000237; 05000249

Operating Tests Administered: August 6 through 14, 2012

The following documents observations made by the NRC examination team during the initial operator license examination. These observations do not constitute audit or inspection findings and are not, without further verification and review, indicative of non-compliance with 10 CFR 55.45(b). These observations do not affect NRC certification or approval of the simulation facility other than to provide information which may be used in future evaluations. No licensee action is required in response to these observations.

During the conduct of the simulator portion of the operating tests, the following items were observed:

ITEM	DESCRIPTION
MMI #8603	During JPM to Lower Torus Water Level, the Controls for LCV 2-3301, NORMAL M-U VLV, Behaved Erratically.

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Sincerely,

/RA/ By Dell R. McNeil Acting For/

Hironori Peterson, Chief Operations Branch Division of Reactor Safety

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DATE

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