

DCJ

MAR 27 1991

Docket Nos.: 50-387
50-388

Pennsylvania Power & Light Company
ATTN: Mr. Harold W. Keiser
Senior Vice President - Nuclear
2 North Ninth Street
Allentown, Pennsylvania 18101

Gentlemen:

SUBJECT: REACTOR OPERATOR LICENSING EXAMINATIONS AND INSPECTION OF THE
EMERGENCY OPERATING PROCEDURES (EOPs)

In a telephone conversation between Mr. Peal, Operations Training Supervisor, and Ms. T. Walker, Chief Examiner, arrangements were made for the administration of licensing examinations and inspection of the Emergency Operating Procedures at the Susquehanna Steam Electric Station. The objective of the EOP inspection is to address open items identified in Inspection Report Nos. 50-387/90-80 and 50-388/90-80.

The examinations and inspection are scheduled for the week of July 8, 1991.

To meet the above schedule, it will be necessary for you to furnish the reference material listed in Enclosure 1, "Reference Material Requirements" by May 6, 1991. Any delay in receiving approved, properly bound and indexed reference material, or the submittal of inadequate or incomplete reference material may result in the examination being rescheduled. Mr. Peal has been advised of our reference material requirements, and the address where each set is to be mailed.

You are responsible for providing adequate space and accommodations for administration of the written examinations. Enclosure 2, "Requirements for Administration of Written Examination," describes our requirements for conducting these examinations.

Enclosure 3 contains the Rules and Guidelines that will be in effect during the administration of the written examination. The facility management is responsible for ensuring that all applicants are aware of these rules.

The facility staff review of the written examination will be conducted in accordance with requirements specified in Enclosure 4, "Requirements for Facility Review of Written Examinations."

To better document simulator examinations, the Chief Examiner will have the simulator operator record predetermined plant conditions (i.e., plant pressure, temperature, etc.), for each simulator scenario. The applicants will be responsible for providing this information, with any appeal of a simulator

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operating examination. Therefore, your training staff should retain the original simulator examination scenario information until all applicants who took examinations have either passed the operating examination, accepted the denial of their license, or filed an appeal.

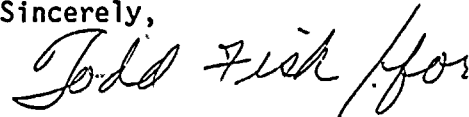
Preliminary reactor operator license applications should be submitted at least 30 days before the examination date so that we will be able to review the training and experience of the candidates, process the medical certifications, and prepare final examiner assignments after applicant eligibility has been determined. If the applications are not received at least 30 days before the examination dates, it is likely that a postponement will be necessary. Final signed applications certifying completion of all training requirements should be received by the Region fourteen (14) days before the examination date.

Mr. Peal has been informed of the above requirements.

This request is covered by Office of Management and Budget Clearance Number 3150-0101 which expires May 31, 1992. The estimated average burden is 7.7 hours per response, including gathering, xeroxing and mailing the required material. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Records and Reports Management Branch, Division of Information Support Services, Office of Information Resources Management, U.S. Nuclear Regulatory Commission, Washington, D. C. 20555; and to the Paperwork Reduction Project (3150-0101), Office of Information and Regulatory Affairs, NEOB-3019, and Office of Management and Budget, Washington, D. C. 20503.

Thank you for your consideration in this matter. If you have any questions regarding the examination procedures and requirements, please contact the undersigned at (215) 337-5210.

Sincerely,



Richard J. Conte, Chief
BWR Section
Operations Branch
Division of Reactor Safety

Enclosures:

1. Reference Material Requirements
2. Requirements for Administration of Written Examinations
3. NRC Rules and Guidelines for Written Examinations
4. Requirements for Facility Review of Written Examinations

cc w/encls.:

A. R. Sabol, Manager, Nuclear Quality Assurance
J. M. Kenny, Licensing Group Supervisor
H. C. Stanley, Superintendent of Plant-SSES
R. G. Bryam, Superintendent of Plant-SSES
S. B. Ungerer, Manager, Joint Generation Projects Department
J. D. Decker, Nuclear Services Manager, General Electric Co.
B. A. Snapp, Esquire, Assistant Corporate Counsel
H. D. Woodeshick, Special Office of the President
W. Lowthert, Manager, Nuclear Training
D. Kapuschinsky, Sr. Nuclear Plant Specialist
J. C. Tilton, III, Allegheny Electric Cooperative, Inc.
Public Document Room (PDR)
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Commonwealth of Pennsylvania

bcc w/encls.:

Region I Docket Room (with concurrences)
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P. Cortland, NRR
J. Joyner, DRSS
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OL Facility File
DRS Files (5)

RI:DRS
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ENCLOSURE 1

REFERENCE MATERIAL REQUIREMENTS

1. Existing learning objectives, Job Performance Measures, student handouts, and lesson plans (including training manuals, plant orientation manual, system descriptions, etc.).

A copy of the facility Job and Task Analysis (JTA), specifying the knowledges and abilities required of an operator at the facility. Each particular knowledge and/or ability will include an importance rating correlating it to ensuring the health and the safety of the public. If a JTA is not furnished, the Knowledges and Abilities Catalog for Nuclear Power Plant Operators, NUREG 1122 (1123) will be used to establish content validity for the examination.

All Job Performance Measures (JPMs) used to ascertain the competence of the operators in performing tasks within the control room complex and, as identified in the facility JTAs, outside of the control room, i.e., local operations.

Training materials shall include all substantive written material used for preparing applicants for initial RO licensing. The written material shall include learning objectives and the details presented during lectures, rather than outlines. Training materials shall be identified by plant and unit, bound, tabbed, and indexed. Training materials, which include the following, shall be provided:

- System descriptions including descriptions of all operationally relevant flow paths, components, controls and instrumentation. System training material should draw parallels to the actual procedures used for operating the applicable system.
 - Complete and operationally useful descriptions of all safety-system interactions and, where available, BOP system interactions under emergency and abnormal conditions, including consequences of anticipated operator error, maintenance error, and equipment failure.
 - Training material used to clarify and strengthen understanding of emergency operating procedures.
2. Complete Procedure Index (including surveillance procedures, etc.).
 3. All administrative procedures (as applicable to reactor operation or safety).
 4. All integrated plant procedures (normal or general operating procedures).

5. All emergency procedures (emergency instructions, abnormal or special procedures).
6. Standing orders (important orders that are safety-related and may supersede the regular procedures).
7. Surveillance procedures (procedures that are run frequently, i.e. weekly or that can be run on the simulator).
8. Fuel-handling and core-loading procedures.
9. All annunciator/alarm response procedures.
10. Radiation protection manual (radiation control manual or procedures).
11. Emergency plan implementing procedures.
12. Technical Specifications (and interpretations, if available) for all units for which licenses are sought.
13. System operating procedures.
14. Piping and Instrumentation diagrams, electrical single-line diagrams, or flow diagrams.
15. Technical Data Book, and/or Plant curve information as used by operators and facility precautions, limitations, and set points (PLS) for the facility.
16. Questions and answers specific to the facility training program which may be used in written or operating examinations (voluntary by licensee).
17. The following on the plant reference simulation facility:
 - a. List of all preprogrammed initial conditions.
 - b. List of all preset malfunctions with a clear identification number. The list shall include cause and effect information. Specifically, for each malfunction a concise description of the expected result, or range of results, that will occur upon implementation shall be provided. Additionally, an indication of which annunciators are to be initially expected should be given.
 - c. A description of simulator failure capabilities for valves, breakers, indicators and alarms.
 - d. Where the capability exists, an explanation of the ability to vary the severity of a particular malfunction shall be provided, i.e., ability to vary the size of a given LOCA or steam leak, or the ability to cause a slow failure of a component such as a feed pump, turbine generator or major valve (e.g., drifting shut of a main feed-water control valve).

- e. An identification of modeling conditions/problems that may impact the examination.
 - f. Identification of any known performance test discrepancies not yet corrected.
 - g. Identification of differences between the simulator and the reference plant's control room.
 - h. Copies of facility generated scenarios that expose the applicants to situations degraded heat removal capability and containment challenges may be provided (voluntary by licensee).
 - i. Simulator instructors manual (voluntary by licensee).
 - j. Description of the scenarios used for the training class (voluntary by licensee).
18. Additional material required by the examiners to develop examinations that meet the requirements of these standards and the regulations.
 19. One full size copy of the EOP flowcharts.
 20. One additional, readable copy of the EOP flowcharts.
 21. Plant Specific Technical Guidelines, including deviation documentation explaining the differences between the Owners Group Emergency Procedure Guidelines and the plant specific technical guidelines.
 22. EOP Writers Guide.
 23. Available documentation addressing the open items identified in Inspection Report Nos. 50-387/90-80 and 50-388/90-80.

The above reference material shall be approved, final issues and shall be so marked. If a plant has not finalized some of the material, the Chief Examiner shall verify with the facility that the most complete, up-to-date material is available and that agreement has been reached with the licensee for limiting changes before the administration of the examination. All procedures and reference material shall be bound with appropriate indices or tables of contents so that they can be used efficiently. Failure to provide complete, properly bound and indexed plant reference material could result in cancellation or rescheduling of the examinations.

ENCLOSURE 2

REQUIREMENTS FOR ADMINISTRATION OF WRITTEN EXAMINATIONS

1. A single room shall be provided for administration of the written examination. The location of this room and supporting restroom facilities shall be such as to prevent contact with all other facility and/or contractor personnel during the written examination. If necessary, the facility should make arrangements for the use of a suitable room at a local school, motel, or other building. Obtaining this room is the responsibility of the licensee.
2. Minimum spacing is required to ensure examination integrity as determined by the Chief Examiner. Minimum spacing should be one applicant per table, with a three foot space between tables.
3. Suitable arrangements shall be made by the facility if the applicants are to have lunch, coffee, or other refreshments. These arrangements shall comply with Item 1 above and shall be reviewed by the examiner and/or proctor.
4. The facility licensee shall provide pads of 8-1/2 by 11 inch lined paper in unopened packages for each applicant's use in completing the examination. The examiner shall distribute these pads to the applicants.
5. Applicants may bring pens, pencils, calculators or slide rules into the examination room. Only black ink or dark pencils should be used for writing answers to questions.
6. The licensee shall provide one set of steam tables for each applicant. The examiner shall distribute the steam tables to the applicants. No wall charts, models, and/or other training materials shall be present in the examination room. No other equipment or reference material shall be allowed unless provided by the examiner.
7. The facility staff shall be provided a copy of the Written Examination and Answer Key after the last candidate has handed in his written examination. The facility staff shall have five (5) working days to provide formal written comments with supporting documentation regarding written examination questions and answers to the chief examiner.

ENCLOSURE 3

NRC RULES AND GUIDELINES FOR WRITTEN EXAMINATIONS

1. Check identification badges.
2. Pass out examinations and all handouts. Remind applicants not to review examination until instructed to do so.

READ THE FOLLOWING INSTRUCTIONS VERBATIM:

During the administration of this examination the following rules apply:

1. Cheating on the examination means an automatic denial of your application and could result in more severe penalties.
2. After the examination has been completed, you must sign the statement on the cover sheet indicating that the work is your own and you have not received or given assistance in completing the examination. This must be done after you complete the examination.

READ THE FOLLOWING INSTRUCTIONS

1. Restroom trips are to be limited and only one applicant at a time may leave. You must avoid all contacts with anyone outside the examination room to avoid even the appearance or possibility of cheating.
2. Use black ink or dark pencil only to facilitate legible reproductions.
3. Print your name in the blank provided in the upper right-hand corner of the examination cover sheet and each answer sheet.
4. Mark your answers on the answer sheet provided. USE ONLY THE PAPER PROVIDED AND DO NOT WRITE ON THE BACK SIDE OF THE PAGE.
5. The point value for each question is indicated in parentheses after the question.
6. Partial credit may be given, except on multiple choice questions. Therefore, ANSWER ALL PARTS OF THE QUESTION AND DO NOT LEAVE ANY ANSWER BLANK.
7. If the intent of a question is unclear, ask questions of the examiner only.
8. When turning in your examination, assemble the completed examination with examination questions, examination aids and answer sheets. In addition, turn in all scrap paper.
9. Ensure that all information you wish to have evaluated as part of your answer is on your answer sheet. Scrap paper will be disposed of immediately following the examination.

10. To pass the examination, you must achieve an overall grade of 80% or greater.
11. There is a time limit of (four) 4 hours for completion of the examination.
12. When you are done and have turned in your examination, leave the examination area (DEFINE THE AREA). If you are found in this area while the examination is still in progress, your license may be denied or revoked.

ENCLOSURE 4

REQUIREMENTS FOR FACILITY REVIEW OF WRITTEN EXAMINATIONS

1. At the option of the Chief Examiner, the facility may review the written examination up to two weeks prior to its administration. This review may take place at the facility or in the Regional office. The review will be conducted using the same material sent to the NRC for exam generation purposes. The Chief Examiner will coordinate the details of the review with the facility. An NRC examiner will always be present during the review.

When this option of examination review is utilized, the facility reviewers will sign the following statement prior to being allowed access to the examination. The examination or written notes will not be retained by the facility.

a. Pre-Examination Security Agreement

I _____ acknowledge that I have acquired specialized knowledge concerning the examination scheduled for _____ at _____ as of the date of my signature below. I agree that I will not knowingly divulge any information concerning this examination to any unauthorized persons. I understand that I am not to participate in any instruction involving those applicants scheduled to be administered the above examination from this date until after the examination has been administered. I further understand that violation of the conditions of this agreement may result in the examination being cancelled and/or enforcement action against myself or the facility licensee by whom I am employed or represent.

Signature/Date

In addition, the facility staff reviewers will sign the following statement after the written examination has been administered.

b. Post-Examination Security Agreement

I _____ did not, to the best of knowledge, divulge any information concerning the examinations administered during the week of _____ at _____ to any unauthorized persons. I did not participate in providing any instruction to those applicants who were administered the examination from the date I entered into this security agreement until the completion of examination administration.

Signature/Date

2. Regardless of whether the above examination review option is exercised, immediately following the administration of the written examination, the facility staff shall be provided a marked up copy of the examination and the answer key. The copy of the written examination shall include pen and ink changes made to questions during the examination administration.

If the facility did not review the examination prior to its administration, they will have five (5) working days from the day of the written examination to submit formal comments. If the facility reviewed the examination prior to its administration, any additional comments must be given to an examiner prior to his/her leaving the site at the end of the week of the written examination administration. In either case, the comments will be addressed to the responsible Regional Office by the highest on site level of corporate management for plant operations, e.g., Vice President for Nuclear Operations. A copy of the submittal will be forwarded to the Chief Examiner, as appropriate. Comments not submitted within the required time frame will be considered for inclusion in the grading process on a case-by-case basis by the Regional Office Section Chief. Should the comment submittal deadline not be met, a long delay in grading the examination may occur.

3. The following format should be adhered to for submittal of specific comments:
 - a. Listing of NRC Question, answer and reference
 - b. Facility comment/recommendation
 - c. Reference (to support facility comment)

NOTES: 1. No change to the examination will be made without submittal of of a reference to support the facility comment. Any supporting documentation that was not previously supplied, should be provided.

2. Comments made without a concise facility recommendation will not be addressed.
4. A two hour post-examination review may be held at the discretion of the Chief Examiner. If this review is held, the facility staff should be informed that only written comments that are properly supported will be considered in the grading of the examination.