February 9, 1993

Docket Nos. 50-387/50-388

License Nos. NPF-14/NPF-22

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

Dear Mr. Keiser:

SUBJECT:

MEETING SUMMARY - NRC REGION I ANNUAL TRAINING

MANAGERS' CONFERENCE CONDUCTED ON

NOVEMBER 23 AND 24, 1992

This letter summarizes the conference conducted at the Sheraton Hotel, King of Prussia, Pa., on November 23 and 24, 1992. The purpose of this meeting was to discuss Region I's positions on operator licensing issues and solicit input from utility training staffs. A summary of the meeting agenda is enclosed. Significant issues raised by the attendees during the presentations and their resolutions are incorporated into Enclosure 3, Issues Raised. Our headquarters program office concurred in these resolutions. The resolution was delayed until Revision 7 to NUREG-1021, "Operator Licensing Examiner Standards," was issued in order to incorporate final positions into the resolutions.

It is our opinion that this conference was beneficial and an excellent opportunity for open discussion of both group's concerns with the operator licensing process.

If you have any questions regarding the content of this letter, please contact Mr. Richard J. Conte at (215) 337-5210.

Lee H. Bettenhausen, Chief

Operations Branch

Division of Reactor Safety

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Enclosures:

- 1. List of Attendees
- 2. Meeting Agenda
- 3. Issues Raised

cc w/encls:

J. M. Kenny, Nuclear Licensing

H. G. Stanley, Superintendent of Plant-SSES

Vice President, Nuclear Operations

M. M. Urioste, Nuclear Services Manager

R. M. Peal, Supervisor, Nuclear Compliance

H. D. Woodeshick, Special Office of the President

A. Fitch, Operations Training Supervisor

J. C. Tilton, III, Allegheny Electric Cooperative, Inc.

Public Document Room (PDR)

Local Public Document Room (LPDR)

Nuclear Safety Information Center (NSIC)

NRC Resident Inspector

Commonwealth of Pennsylvania

bcc w/encls:

Region I Docket Room (with concurrences)

- L. Bettenhausen, DRS
- E. Wenzinger, DRP
- R. Conte, DRS
- J. White, DRP
- J. Trapp, DRS
- J. Noggle, DRSS
- V. McCree, OEDO
- J. Raleigh, NRR, Project Manager

OL Facility Files (2)

DRS Files (2)

RI:DRS Prell/dmg

(N) 02/02/93

RI:DRS Conte

OLB:NRR

Lange

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ENCLOSURE 1

NRC POWER REACTOR OPERATOR LICENSEE MEETING

November 23-24, 1992

<u>FACILITY</u> <u>ATTENDEES</u>

Beaver Valley Tom Burns

Ernie Chatfield

Calvert Cliffs Norm Millis

Bill Birney
Bruce Heistand
Tom O'Meara

FitzPatrick Dave Topley

Gary Fronk Bob Madden Drew Rogers

Ginna Robert Carroll

Frank Maciuska Ron Ruedin

Hope Creek/Salem Art Orticelle

Greg Mecchi Robert Hovey Vince Polizzi Jim Lloyd Bill Gott

Indian Point 2 Frank Inzirillo

Mark Miller

Indian Point 3 Richard Robenstein

William Flynn

Limerick Jim Kantner

Bob Ruffe

Vince Cwietniewicz

Steve Carr

Maine Yankee Jon Kirsch

Mike Evringham Don Stevenson

Millstone 1, 2 and 3 and Haddam Neck

Brad Ruth Rich Spurr Ron Stotts Mike Bray Mike Brown Bob Heidecker

Nine Mile 1 and 2

Bob Sanaker Bob Smith Rick Slade Randy Seifried Jim Reid Gregg Pitts

Oyster Creek

Gil Cropper Clint Silvers Jay Sims Sam Sowell

Jerry Hollingsworth

Darrell Wire Mark Heller Joe Kowalski

Peach Bottom

John Stankiewicz Dennis McClellan Phil Nielsen Paul DiRito

Phila. Electric Chesterbrook Office E.S.Bright
Dennis Knepper

Pilgrim

Paul Gallante Tom Swan Jack Alexander

Seabrook

Bob Hanley Gene St. Pierre Laurits Carlsen Enclosure 1

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Susquehanna

Art Fitch

Howard Palmer Jonathan Seek

Bruce Stitt

TMI-1

Shali Shalikashvili

Mark Trump Daryl Wilt Jeff Bolts Randy Hess

Vermont Yankee

Ed Harms

Larry Amirault Mike Gofekamp Brian Finn Mark Mervine John Herron

Sonalysts .

Brian Haagensen

General Physics Corp.

Jerry Joullian

John Galamback

NRC - Headquarters

Maryann Biamonte John Kauffman Dave Lange

Operator Licensing - Region I

Lee Bettenhausen Rich Conte Glenn Meyer Todd Fish Don Florek Sam Hansell Carl Sisco Scott Stewart Tracy Walker Herb Williams Paul Bissett Larry Briggs Joe D'Antonio Kerry Ihnen Bill Maier Jim Prell Dave Silk Rob Temps Virgil Curley

ENCLOSURE 2

NRC REGION I OPERATOR LICENSE EXAMINERS/TRAINING MANAGERS MEETING NOVEMBER 23 - 24, 1992

November 23, 1992, Monday

Noon - 1:00 PM	Registration
- 1:00 PM	Welcome/Introduction - T. T. Martin Regional Administrator, NRC RI
- 1:30 PM	Keynote Speaker - Arthur Orticelle Training Manager, PSE&G
- 2:00 PM	Keynote Speaker - John Kauffman, AEOD "Human Performance in Events"
- 2:45 PM	Summary of Requal Changes to Examiner Standards - James A. Prell, RI
- 3:15 PM	Break
- 3:30 PM	Breakout Sessions (4 parallel sessions) Revision 7 for Requalification Examinations
- 5:00 PM	Adjourn
November 24, 1992, Tuesday	
- 8:00 AM	Breakout Sessions (continued)
- 9:30 AM	Break

November 24, 1992, Tuesday (con't)

- 9:45 AM	Reports of Current Activities:
	- Challenges and Changes
	D. Lange, NRC, HOLB
	- Industry Scenario Guidelines-WOG
	R. Heidecker, CYAPCO
	- Training Rule Implementation
	M. A. Biamonte, NRC, HHEB
	- Rev. 7 for Initial Examinations
	T. Walker, RI

T. Walker, RI
and A. Shiever, BECO
- Region I Update
L. Bettenhausen, RI

- 12:30 PM	Lunch
- 1:30 PM	Report of Breakout Sessions
- 2:30 PM	Meeting Summation
- 3·00 PM	Adiourn

ENCLOSURE 3

ISSUES RAISED

ES - 601 ADMINISTRATIVE

- Q: Is there a limit to the number of people that can be put onto the security agreement?
 - A: No, but the facility and NRC should try to minimize the number of people which have to be added to the security agreement.
- Q: How should simulator stand-ins be counted for program evaluation purposes?
 - A: Both the stand-ins who are determined to be Satisfactory and those who are found to be Unsatisfactory are included in the numbers used for determining if a facility has a satisfactory program or not.
- Q: If the past year's requal program had less than 12 operators so that a program evaluation could not be performed at that time, and this year's requal program has more than 12 operators, do you include last year's count and results in this year's program evaluation?
 - A: A program evaluation will be performed using only this year's results with 12 or more operators.
- Q: When there are less than 12 operators left to be examined within the six year cycle, will program evaluations continue to be conducted?
 - A: Yes, the NRC intends to continue program evaluations, and the Region will work with the facility to design an examination that can be used for a program evaluation.
- Q: The guidance related to JPM sequestering in order to prevent compromising the walkthrough exam has been removed in Revision 7. Why was this done?
 - A: Since a minimum number of common JPMs are no longer mandated, sequestering of the operators is not as big a concern. It is the chief examiner's responsibility to assure that adequate security is provided to prevent exam compromise. This is achieved through several methods; using a number of different JPMs so that duplication of JPMs between operators does not exist or

Enclosure 3 2

is random, using a modified form report for work just prior to the first other mutually agreed upon scheme facility.

is random, using a modified form of sequestering by having the second crew report for work just prior to the first crew completing their JPMs, or some other mutually agreed upon scheme between the chief examiner and the facility.

- Q: The examiner standards need to address what is meant by "the most recent cycle" with regards to using simulator scenarios for training purposes. Does the most recent cycle refer to the previous six week training cycle or the previous 24 month requal cycle?
 - * A: The most recent training cycle has been defined in ES-601 as that continuous period of time (not to exceed 24 months) within which the facility conducts its operator requalification program.

ES - 603 WALK-THROUGH

- Q: Is there a minimum number of "faulted" JPMs which the facility must have in its JPM bank?
 - A: No however, the facility is expected to have some faulted JPMs in their JPM bank to select from for the examination.
- Q: Does the NRC expect that a minimum of one of the five JPMs given to each operator be a faulted JPM?
 - A: No The NRC expects that the examination for each operator be an appropriate balance among the items listed in Part 55.45(a), so that tasks contained in normal, abnormal and emergency procedures are evaluated. It is up to the examination team to determine whether alternate-path JPMs will be used to accomplish this goal.
- Q: Are shutdown/low power JPMs required to be administered on each exam?
 - * A: The JPMs selected for each examination should reflect the sample plan for the requalification cycle, plus selected topics from outside the sample plan (not to exceed 20% of the examination). Shutdown/low power JPMs may be used but are not required for each examination.
- Q: Is each operator required to perform at least one shutdown/low power JPM?
 - A: No but there should be enough shutdown/low power JPMs administered during the examination so that the NRC is assured that the operators have been trained to respond to events while in these modes of operation.

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- Q: What is the NRC's intent of having time critical JPMs which are based on maximum acceptable times established by subject matter experts at the facility?
 - * A: Time critical JPMs established by subject matter experts have been deleted from the approved version of Revision 7. Time critical JPMs should be based solely on regulatory requirements or facility commitments with the NRC.
- Q: Because the amount of time allotted for performing the JPMs has remained the same between Rev 6 and Rev. 7 while the number of JPMs and the number of prescripted questions have been reduced or eliminated respectfully, does this imply that longer JPMs are now required?
 - A: No
- Q: Are there any minimum time requirements that a JPM takes to perform?
 - A: No the facility will determine the technical basis for the JPM validated time.

ES - 604 SIMULATOR

- Q: If the operating crew does not normally rotate crew members among the various licensed positions, are they required to rotate these operators during the dynamic simulator?
 - A: The crew should be tested as they operate and train. Accordingly, if an RO splits his operating time between positions, the RO should rotate during the exam. However, an SRO or an RO need not rotate to address a position infrequently held.
- Q: How should licensed STAs be rotated into the crew to which they are assigned for requalification purposes?
 - * A: The STA is not recognized as a "licensed" crew position for purposes of requalification examinations. Each licensed operator must participate in two scenarios in a licensed crew position to complete the requirements for requalification. Rotation will be required for licensed operators who participate in scenarios as STAs.
- Q: What is the minimum number of scenarios in which each individual must be tested?
 - A: Two

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- Q: What is the minimum remediation required for someone in a crew which has failed but who has not been identified as having any problems?
 - A: The facility decides what, if any, remediation is required for that individual.
- Q: Do all members of a failed crew need to undergo an NRC reexamination before their license is renewed?
 - A: Yes
- Q: For large operating crews, do those members of the crew, who were not participating in a particular scenario because of simulator crew size restrictions, have to be reexamined by the NRC if the simulator exam crew fails?
 - * A: No. However, each licensed operator must be a member of a simulator exam crew that successfully completes two dynamic simulator scenarios.
- Q: For an operator who has been identified as having possible weaknesses during the simulator exam, guidance is needed as to how extensive the follow-up evaluation should be, who should conduct this evaluation, when should this evaluation be conducted, and what the impact on stress is, while the evaluation process is being determined.
 - A: The purpose of the follow-up evaluation is to determine the scope and breath of the operator's deficiency demonstrated during the scenario. If an examiner observes an individual who demonstrates significant deficiencies performing a critical task, the NRC examiner and the facility evaluator will discuss those deficiencies at the completion of the scenario. The facility evaluator or NRC examiner will then ask follow-up question(s) to determine the cause of the performance deficiencies. Following the conduct of both scenarios, if the examination team determines that additional follow-up performance evaluation is necessary to make a pass or fail decision, the examination team will agree upon a time to conduct the appropriate additional scenario or JPM.
- Q: When should the follow-up scenario or JPM be given for reevaluation purposes?
 - A: If an examiner observes an operator demonstrate significant deficiencies performing a critical task, but cannot assess the deficiency due to a lack of performance information, the examination team has the option to conduct a follow-up JPM or an additional scenario to obtain additional performance information. The examination team should use the time in between scenarios to conduct individual follow-up questioning concerning deficient operator

Enclosure 3

performance. The examination team the scenario set before deciding who necessary. The information obtaine provide a sufficient basis to determine examination without having to condexamination team should consider the crews participating in the examination JPMs, or scenarios.

performance. The examination team should wait until the crew has completed the scenario set before deciding whether an additional scenario or JPM will be necessary. The information obtained from the follow-up questions may provide a sufficient basis to determine whether the operator passes or fails the examination without having to conduct an additional scenario or JPM. The examination team should consider the stress on the affected crew and the other crews participating in the examination when conducting follow-up questioning, IPMs, or scenarios.

- Q: Is it necessary that all the quantitative criteria of Rev. 7 for scenarios be met?
 - A: No these criteria are only guidelines. Nonetheless, the facility should be able to justify acceptability if not meeting them.
- Q: Since Combustion Engineering type plants only have one EOP contingency procedure, are they required to enter this procedure at least once during each scenario set?
 - * A: It is our intention to observe each crew conduct operations using the procedures or actions listed in Part D. of Attachment 3 to ES-604. CE procedures that essentially perform the same function as those listed for Westinghouse (Optimal Recovery Procedures or Functional Recovery Procedures) and are not listed for Combustion Engineering, may be proposed by the facility for use in the examination to meet this guideline.
- Q: Is it allowable to count E-0 in meeting the EOP criterion?
 - * A: No. ES-604 Attachment 3 states that E-0 will not be counted in the overall EOP total.
- Q: What is gained by requiring the use of low power scenarios versus scenarios at 100 percent power?
 - A: The NRC has identified a number of high risk events that have occurred at facilities during low power operations. The NRC considers that operators who are properly informed and who understand the problems that could arise during low power operations are essential in reducing risks associated with these activities. Through comprehensive training programs, operators can gain such knowledge and understanding, thus increasing the level of safe operation at nuclear plants. The level of knowledge and abilities are qualitatively measured by a comprehensive examination. It should be noted that low power scenarios are not required on each examination, rather, the scenarios should be included in the dynamic simulator bank and should be available for selection during the examination.

Enclosure 3

- Q: Are low power scenarios required to be made a part of the facility's scenario bank?
 - A: Low power operations should be included in either the facility's scenario bank or JPM bank or both.
 - * This answer has been revised or updated from the answer presented at the conference, frequently to reflect the specifics of the approved Revision 7.