

Indiana Michigan  
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Cook Nuclear Plant  
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Attachment 3

~~CONFIDENTIAL~~



Tom Burdick, Chief  
Operator Licensing Branch  
Region III  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

November 5, 1987

Dear Mr. Burdick:

SUBJECT: D. C. COOK REQUALIFICATION PROGRAM UPGRADE/60 DAY LETTER

In response to your request made during our September 9, 1987 meeting, attached is a description of improvements to our Requalification Training Program.

Attachment 1 is a summary of the Requal Year 13 schedule. The Requal Year 13 schedule was developed based on a review of Requal Year 12 examinations, NRC guidance provided in NUREG-1021, "Operator Licensing Examiner Standards," and recommendations made by the consultant hired to provide Requal Year 12 oral and written examinations. This schedule requires increased classroom time over previous schedules and integrates use of our site-specific simulator into the training program. This schedule is subject to change to meet operating needs but our commitment to increase weekly contact time will be preserved.

Attachment 2 is a description of the improvements incorporated into the Requalification Training Program.

Our commitment to training remains unchanged. A tremendous amount of resources and funds have been allocated by AEP to ensure that the commitment is sound and that these training efforts result in establishing D. C. Cook as a model for expertise and professionalism throughout the industry. The events which occurred during Requal Year

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12 serve not to deter us from this goal but rather provide us an outside perspective of areas needing improvement and reinforcement for the ultimate accomplishment of the goal.

Sincerely,

*John A. Subbfield For W.A. Nichols*  
W. A. Nichols, Training Manager

/jc

Attachments



CONTACT HOUR SUMMARY  
 REQUALIFICATION PROGRAM 13

The courses and estimated contact time outlined in the Syllabus for Program 13 are summarized below.

<u>CLASSROOM</u>	<u>HOURS</u>
Fundamentals (Reactor Protection, Thermo, Materials, etc.)	13
Plant Systems	30
Reactor Protection	13
Instrumentation and Control	17
Procedures	34
Operational Review	34
CLASSROOM TOTAL	141
SIMULATOR TRAINING - SNUPPS	40
SIMULATOR TRAINING - SITE SPECIFIC (Contingent on Cook Simulator Available May 16, 1988)	68
 <u>EVALUATION</u>	 <u>HOURS</u>
Periodic Quiz Administration	36
Annual Operational Exams (Inplant and Simulator)	10
Biennial Written Exam	6
EXAM CONTACT TOTAL	52
 <u>FIRE BRIGADE TRAINING</u>	 14
 <u>REQUALIFICATION PROGRAM CONTACT HOURS</u> (26.25 Hours per Requal Week over 12 Weeks)	 315



## ATTACHMENT 2

1. The practice of four ten-hour work days for operating shifts while in training has been discontinued. Requalification training schedules will be built around five eight-hour days per Requal week.
2. Review of past training material will be conducted during each week of Requalification training.
3. In order to properly integrate our site specific simulator into Requalification the Requal Year 13 Schedule has been extended four months. This will start our biennial Requalification Program on January 1st instead of September 1st.
4. Full participation in the Requalification Program (lecture attendance and completion of related quizzes) will be mandatory for all Licenses. The Requal Program controlling document is being modified to require attendance at all lectures in a given Requal period. It is recognized that circumstances may prevent lecture attendance; therefore, individual presentations by an instructor or viewing of a videotaped lectures may fulfill this requirement. In all cases attendance will be documented by completion of attendance sheets and filed in the individual's records.
5. The following recommendations were made by the consultant contracted to provide Requal Year 12 oral and written examinations. These recommendations are now resident in the DC Cook Requalification Program.
  - a. Systems and instrumentation knowledge appears to have degraded. Increased emphasis on these areas should be conducted in Requal Year 13.
  - b. Procedure knowledge should be emphasized for both RO and SRO personnel.
  - c. More formal presentations of modifications and LER's applicable to or originating from the DC Cook Plant should be emphasized due to the noted unfamiliarity of those events which were not covered in formal training sessions.

- d. Although we realize that the shortened written examinations (4-hour instead of 6-hour) were mandated by NRC, we strongly recommend that the 6-hour exam is better at indicating knowledge weaknesses for experienced individuals. The failure rate will be higher for a four-hour examination with the same average (over the entire group) grades than for an equivalent six-hour examination. A three-point question (some of which were used on the shortened examinations) that is missed in each section (along with the usual scattered partially incorrect responses) will likely result in failure on the overall exam for the shorter examination.
6. Requalification Simulator Training provided on the SNUPPS machine has been modified to stress the operational impact of plant instrumentation and controls. This modification was in response to both the NRC and PQS recommendation from Requal Year 12 Annual Examination.
  7. Evaluation of the Requalification Program will be completed in accordance with PMP 2070.TRN.003, "Evaluation of Training Program Effectiveness."
  8. The Operations Training Section has been augmented whereby there have been three instructors identified to perform only Requalification Training Duties. These three instructors will be supplemented as necessary by those instructors whose primary function is to support other ongoing operator training.
  9. Operations Training Staff size has been expanded by one instructor. The instructor filling this position was previously granted an NRC SRO Instructor Certification. This increases Operator Training Staff to a level of twelve (12) instructors.
  10. Presently, DC Cook has four dedicated Simulator Instructors involved in the procurement of a site specific simulator. Upon completion of the simulator Availability Demonstration Milestone, three instructors will direct their efforts toward providing simulator instruction for the Requalification Program. This will effectively raise the number of instructors dedicated to Requalification to six.

11. The number of Licensees assigned to staff positions outside the Operations Department has been significantly reduced and will be strictly controlled. (This does not preclude maintaining knowledge/proficiency by these individuals, where appropriate, through attendance at Training.)
12. The scope of the Requalification Program "Readit Package" has been redefined. The redefined scope includes classroom instruction and periodic quizzes.
13. With the increased scope of the "Readit Package" as addressed by Item 12, acquisition of a site specific simulator and increased emphasis on EOP bases, the Requalification Program will more adequately address the knowledge requirements at an SRO level.
14. Operator training examination preparation and review processes are presently under revision using NUREG 1021 as a guide.
15. One Requalification Program Instructor has received extensive training in examination preparation, administration and review. This training was conducted by Industrial Training Group (ITG) during the month of September 1987. This training will enable the Operations Training Staff to develop higher quality examination questions and answers which will reduce subjectivity and enhance our exam bank.
16. Increased emphasis on quality of exam question and answer development, as described in Item 15, will over a period of time increase the size of our exam bank. This effort in conjunction with the projected future use of a computerized examination bank generator should reduce the question duplication now existing in weekly quizzes and annual written examinations.
17. Requalification weekly quizzes will continue to be provided. Each quiz will be reviewed immediately upon completion by all examinees. A detailed review of the graded exam from the prior period will also be conducted. This in conjunction with item (2) of this report will provide immediate feedback and a continuous review of Requal topics.
18. A committee has been assembled to determine the scope of work required to align NUREG 1122, "Knowledges and Abilities Catalog for Nuclear Power Plant Operators: Pressurized Water Reactors," to our existing training material. The scope of this task is not well defined by the industry and therefore recommendations will be made to DC Cook management as to the feasibility of accomplishing this task in the short term.





19. Operator Training Program Procedures are presently under revision to enhance the present guidelines for selection of candidates for enrollment into operator training programs at all levels. Other revisions will also enhance the actual training being delivered and increase the efficiency of the Training Staff. Increasing efficiency, enhancing material development and enhancement of our selection process will aid in reducing the number of program failures at all levels.
20. Three Operator Training Instructors attended a 40-hour workshop on Teaching Reactor Theory. This workshop concentrated on presentation methods and delivery of related concepts. Two of these individuals are Requalification Program Instructors. The workshop was presented by Westinghouse during September 1987.
21. Operations and Training Management have reaffirmed their commitment to continued evaluation of all phases of Requalification Training. This commitment will be reinforced by program procedure changes requiring management evaluation and involvement.