

Docket No. 50-315
Docket No. 50-316

Indiana Michigan Power Company
ATTN: Mr. Milton P. Alexich
Vice President
Nuclear Operations Division
1 Riverside Plaza
Columbus, OH 43216

Dear Mr. Alexich:

Your October 2, 1989, letter to Mr. Davis was in response to our examination report 50-315/OL-89-01 in which we cited programmatic weaknesses in your simulator training process. You expressed agreement with some of our concerns and indicated that improvements in the areas of simulator evaluation, programmatic performance review and SRO control board training would be implemented. You made reference in your letter to an independent audit of your simulator program and offered us the results of this audit. We would appreciate a copy of the audit results when they are available.

You also responded to our concern regarding implications that the simulator program weaknesses might have on the qualifications of incumbent operators. You expressed confidence that incumbent operators are unaffected by the identified programmatic deficiencies. We will evaluate incumbent operators and your requalification program effectiveness in December 1989.

One issue you did take exception with was the NRC's use of more than one of what you classified as unrelated major casualties within a single scenario. You stated that according to Examiner Standard 301 this was inappropriate.

We believe that your position stems from an incorrect interpretation of guidance that the NRC employs to develop simulator scenarios, including what constitutes a major casualty. 10 CFR 55 and NUREG 1021 (Operator Licensing Examination Standards) establish the basic methodology to be used for evaluations under varying dynamic circumstances during the examination process. In this process, candidates are to be challenged with conditions and symptoms of plant upsets that exercise the full range of the licensee's emergency procedures. They are presented to the exam candidate in as close to a real time manner as possible with obvious constraints. Our guidance includes specific requirements regarding types of event categories such as instrument and component failures as well as normal, abnormal, and emergency conditions. We are required to employ at least a minimum number of specified events within these scenarios. The guidance dictates that candidates be presented with these events in a manner such that each event should interact with the other. This leads the candidate into a progressive deterioration of plant conditions which are consistent with those postulated in your emergency operating procedures.

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We consider this matter to be important. It needs to be addressed promptly to avoid future misunderstandings and problems in the examination process. Therefore, we would like to meet with your staff to discuss this further. Please advise Mr. Thomas Burdick at 312/790-5566 of possible dates on which we might hold such a meeting in Region III offices.

ORIGINAL SIGNED BY HUBERT J. MILLER

Hubert J. Miller, Director
Division of Reactor Safety

cc: A. A. Blind, Plant Manager
DCD/DCB (RIDS)
Licensing Fee Management Branch
Resident Inspector, RIII
Ronald Callen, Michigan
Public Service Commission
EIS Coordinator, USEPA
Region 5 Office
Michigan Department of
Public Health

*discussed w. GW
by telecon*

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