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Docket No. 50-255

Consumers Power Company  
ATTN: Gerald B. Slade  
General Manager  
Palisades Nuclear Generating Plant  
27780 Blue Star Memorial Highway  
Covert, MI 49043

Dear Mr. Slade:

SUBJECT: REQUALIFICATION PROGRAM EVALUATION

Arrangements have been made between Mr. D. Rogers, and Mr. J. Walker for an evaluation of the requalification program and licensed personnel at your Palisades facility. The evaluation visit is scheduled for the week of March 22, 1993. The requalification examinations and the subsequent evaluation of the facility requalification program will be performed in accordance with sections 601 through 604 of NUREG 1021, Operator Licensing Examiner Standards, Revision 6. You are encouraged to ensure that your training staff and proposed examinees are familiar with these standards.

For the examiners to adequately prepare for this visit, it will be necessary for the facility to furnish the approved items listed in Enclosure 1, "Reference Material Requirements." Failure to supply the reference material as required by Enclosure 1 may result in postponement of the examination. We have offered Mr. D. Rogers the opportunity to provide a proposed requalification examination. Submittal of proposed examinations is optional and in addition to the material requirements of Enclosure 1. If you decide to submit a proposed examination, we request that we receive the proposed simulator scenarios at least 45 days in advance of the examination week. We also request that you provide a copy of the scenarios to U.S. Nuclear Regulatory Commission, ATTN: Chief, LOLB, Washington, D.C. 20555. Those personnel involved in the development of the proposed examination will become subject to the security restrictions described below. Mr. D. Rogers has been advised of our reference material requirements, proposed examination option, and where these items are to be sent.

You are requested to designate at least one employee to be a member of a joint NRC-facility examination team. The employee shall be an active SRO (per the requirements of 10 CFR 55.53(e) or (f)) from the Palisades Operations Department. You are encouraged to designate a second employee from the training staff to be a member of the examination team. This employee should be an active SRO (per the requirements of 10 CFR 55.53(e) or (f)), but may be a facility or INPO certified instructor. If desired

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and agreed to by the Chief Examiner, you may designate one additional employee from the examination team. In addition to these individuals, a simulator operator must be made available for scenario preview and validation during the onsite examination preparation week. In some cases, it may be necessary to designate a simulator operator during the test item review period. This individual will also be subject to the examination security agreement.

Any facility representatives under the security agreement shall be restricted from knowingly communicating by any means the content or scope of the examination to unauthorized persons and from participating in any facility programs such as instruction, examination, or tutoring in which an identified regualification examinee(s) will be present. These restrictions shall apply from the day that the facility representative understands that he or she has specialized knowledge of the examination. The Chief Examiner will determine when facility representatives have received specialized knowledge concerning the examination and require execution of an examination security agreement. In most cases, the examination team members will not be required to enter into an examination security agreement more than 60 days prior to the examination week. The simulator operator will normally become subject to the requirements during the examination preparation and validation week but, in some cases, this may occur as much as 30 days prior to the examination week to support operating test item review and revision.

The facility shall identify to the NRC 60 days prior to the examination administration date, the proposed operators, including crew composition, for the examination. This information should be provided by the facility training staff to the NRC's Chief Examiner.

The facility management is responsible for providing adequate space and accommodations to properly develop and conduct the examinations. Enclosure 2, "Administration of Regualification Examinations," describes our requirements for developing and conducting the examinations. Mr. D. Rogers has also been informed of these requirements. Also, a facility operations management representative (as a minimum, first level above shift supervisor) should observe the simulation facility examination process at the site.

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

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Please review the guidance promulgated in Revision 6 to NUREG-1021 pertaining to the content and scope of simulator examination scenarios. The scenario examination bank should cover the entire spectrum of Emergency Operating Procedures (EOPs), including alternate decision paths within EOPs, and should incorporate a range of failures with varying degrees of severity for the same type of event. Each scenario should contain simultaneous events that require that the crew prioritize actions and assign crew members to particular tasks. Each scenario should also require that the crew determine when to transition between EOPs and determine which actions to take within the EOPs.

This request was previously covered by Office of Management and Budget (OMB) Clearance Number 3150-0101 which expired May 31, 1992. A request for a clearance extension has been submitted to OMB and is expected to be granted. The estimated average burden is 7.7 hours per response, including gathering, copying 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 Information and Records 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, Office of Management and Budget, Washington, D.C. 20503.

Thank you for your consideration in this matter. If you have any questions on the evaluation process, please contact J. Walker at (708) 790-5563.

Sincerely,

ORIGINAL SIGNED BY GEOFFREY C. WRIGHT

Geoffrey C. Wright, Chief  
Operations Branch

Enclosures:

- 1. Reference Material Requirements
- 2. Administration of Requalification Examinations
- 3. NRC Rules and Guidance for Examinees

See Attached Distribution

RIII  
*pcw*  
Lennartz/cg  
11/12/92

RIII  
*B*  
Burdick  
11/12/92

RIII  
*pcw*  
Wright  
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RIII  
*CJP*  
Paperiello  
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RIII  
*CJP*  
Davis  
11/12/92

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Distribution

cc w/enclosures:

David P. Hoffman, Vice President  
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P. M. Donnelly, Safety and  
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DCD/DCB (RIDS)

OC/LFDCB

Resident Inspector, RIII

James R. Padgett, Michigan Public  
Service Commission

Michigan Department of  
Public Health

SRI, Big Rock Point

D. Rogers, Training Manager

cc w/o enclosures:

R. M. Gallo, Branch Chief, OLB

A. S. Masciantonio, Project Manager, NRR

B. L. Jorgensen, Section Chief, DRP

## ENCLOSURE 1

### REFERENCE MATERIAL REQUIREMENTS

Test items to support all aspects of the requalification examination must be provided to the NRC 60 days prior to the examination date.

All test items should be developed in accordance with the guidelines provided in sections 602 through 604 of NUREG 1021, Operator Licensing Examiner Standards, and their respective attachments.

For the first requalification evaluation at the facility, the submittal must contain at least:

- 700 test items for use in the written examination. They should be equally divided between the two sections of the examination and there must be at least 350 test items for use in each section.
- 75 job performance measures (JPMs) for use on the walk-through portion of the operating examination. To the extent possible, approximately 40% of the JPMs should evaluate "in plant" tasks (system/component operation outside the control room).
- 15 simulator scenarios of approximately 50 minutes each in length for use on the simulator portion of the operating examination for examinations administered in one week.

For subsequent requalification examinations facilities are expected to make submittals reflecting progress toward the following targets over the next 5 years after the initial evaluation visit:

- A minimum of 700 test items for use in the written examination equally divided between the two sections of the written examination and which cover all safety related elements of the facility job task analysis (JTA). The bank shall be dynamic in nature, in that at least 150 questions a year shall be reviewed, revised or generated. New questions that are developed should cover equipment and system modification, recent industry and licensee events and procedural changes.

ENCLOSURE 1 (Cont'd)

JPMs to evaluate each operator and senior operator safety related task identified in the facility JTA, which meet the criteria in ES-603. The JPM bank should expand at a rate of at least 10 JPMs per year until this goal is reached. It is estimated that 125-150 JPMs will be the final result. Development of the questions associated with the JPMs shall also continue, such that there is a representative sample of questions given the knowledges associated with the task listed in the JTA.

- A bank of at least 30 simulator scenarios which reflect all plausible or expected abnormal and emergency situations to which control room operators are expected to respond or control. At least 5 scenarios per year should be generated until all aspects of the emergency operating procedures are covered with sufficient variation in the type and scope of initiating events and level of degradation.

For all requalification examination and evaluation visits, the facility shall:

- submit an Examination Test Outline/Sample Plan which meets the requirements of ES-601, Attachment 2;
- provide the associated examination banks (written, simulator and JPM) and associated reference material. At a minimum this shall include Technical Specifications, abnormal and emergency operating procedures, and emergency plan procedures utilized in the requalification training;
- provide additional reference material as requested by the Chief Examiner.

ENCLOSURE 2

ADMINISTRATION OF REQUALIFICATION EXAMINATIONS

1. An evaluation of at least twelve facility licensed operators is required for a program evaluation. Normally the crew scheduled for requalification training during the period selected for the program evaluation should be selected. The sample will include other licensed operators who are not routinely performing shift duties or are not maintaining an active license per 10 CFR 55.53(e). The restrictions on crew composition in the simulator are described in ES-601(C.1.b.) and ES-604.
2. The simulator and simulator operator(s) shall be provided for examination development. The date(s) and duration of time needed to develop the examinations will be agreed upon by the chief examiner and the facility.
3. The reference material used in the simulator will be reviewed by the chief examiner. No material will be used that is solely used for training.
4. A single room shall be provided for completing Section B of the written examination. The location of this room and supporting rest room facilities shall be such as to prevent contact with all other facility and/or contractor personnel for the duration of the examination.
5. Minimum spacing is required to ensure examination integrity and will be evaluated by the chief examiner. Minimum spacing consists of one examinee per table and a 3-foot space between tables. No wall charts, models, and/or other training materials shall be present in the examination room.
6. Copies of reference material for Section B of the written examination shall be provided for each examinee. The reference material will be reviewed by the chief examiner and will consist of Technical Specifications, operating/abnormal procedures, administrative procedures, and Emergency Plans as available to the plant operators.
7. The NRC no longer requires the facility licensee to videotape dynamic simulator examinations. If the facility licensee requests to videotape the examination, any use of the tape must be completed before the NRC leaves the site at the end of the examination. If a disagreement over the grading of a licensee still exists at the end of the examination week, the facility licensee may retain the tape for the sole purpose of submitting it to support a request for regrade by the NRC. During the regrade, the NRC will review only the portion of the videotape under contention.

ENCLOSURE 2 (Cont'd)

8. An attempt will be made to distinguish between RO and SRO knowledge and abilities to the extent that such a distinction is supported by the facility training materials.
9. Prudent scheduling of exam week activities is important to help alleviate undue stress on the operators. Your training staff and the Chief Examiner should work very closely in formulating a schedule which does not result in excessive delays in crews or individuals being administered their examination. The following are some suggestions for structuring the exam activities to achieve this purpose:
  - Don't bring in crews or individuals well before their scheduled exam times.
  - When examining operators in groups, it is better to hold the group just completing their exam vice the group that are taking their exam later.
  - Following simulator scenarios, the facility evaluators and NRC examiners should quickly determine whether follow-up questioning is required, so that the crew may be released to talk among themselves about the scenario.
  - Ensure that time validation of JPMS, particularly those performed in the simulator, is conducted accurately. A reasonable schedule should be established to prevent operators from waiting for simulator availability to complete their JPMS.



ENCLOSURE 3

NRC RULES AND GUIDANCE FOR EXAMINEES

1. Use black ink or dark pencil ONLY to facilitate legible reproductions.
2. Print your name in the blank provided on the cover sheet of the examination.
3. Fill in the date on the cover sheet of the examination, if necessary.
4. Answer each question on the examination. If additional paper is required, use only the lined paper provided by the examiner.
5. Use abbreviations only if they are commonly used in facility literature.
6. The point value for each question is indicated in parentheses after the question and can be used as a guide for the depth of answer required.
7. Show all calculations, methods, or assumptions used to obtain an answer to a mathematical problem whether asked for in the question or not.
8. Unless solicited, the location of references need not be stated.
9. Proportional grading will be applied. Any additional wrong information that is provided may count against you. For example, if a question is worth one point and asks for four responses, each of which is worth 0.25 points, and you give five responses, each response will be worth 0.20 points. If one of your five responses is incorrect, 0.20 will be deducted and your total credit for that question will be 0.80, even though you may have listed the four correct responses in the answer key.
10. Partial credit may be given. Therefore, ANSWER ALL PARTS OF THE QUESTION AND DO NOT LEAVE ANY ANSWERS BLANK. Partial credit will NOT be given on multiple choice questions.
11. If parts of the examination are not clear with respect to their intent, ask questions of the examiner only.

ENCLOSURE 3 (Cont'd)

12. You must sign the statement on the cover sheet that indicates the work on the examination is your own and that you have not received or been given any assistance in completing the examination. This must be signed AFTER the examination has been completed.
13. Rest room trips are to be limited and only one examinee at a time may leave. You must avoid all contact with anyone outside the examination room to avoid even the appearance or possibility of examination compromise.
14. Cheating on the examination would result in a revocation of your license and could result in more severe penalties.
15. Each section of the examination is designed to take approximately 90 minutes to complete. You will be given two hours to complete each section to allow for thirty minutes of review.
16. The examination has been time validated by knowledgeable persons. You should be aware that not every answer needs to be verified by consulting a reference, and excessive usage of reference material may cause you to not complete the examination in the allotted time.
17. Due to the existence of questions that will require all examinees to refer to the same indications or controls, particular care must be taken to maintain individual examination security and avoid any possibility of compromise or appearance of cheating.
18. When you are finished and have turned in your completed examination, leave the examination area.