

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

August 30, 1994

Mr. Robert M. Gallo
Chief, Operator Licensing Branch
Mail Stop OWFN 10 D-22
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 94-493
NL&P/ETS
Docket Nos. 50-280
50-281
50-338
50-339
License Nos. DPR-32
DPR-37
NPF-4
NPF-7

Dear Mr. Gallo:


VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
NORTH ANNA POWER STATION UNITS 1 AND 2
UTILITY DEVELOPMENT OF INITIAL LICENSING EXAMINATIONS PROPOSAL

On June 29, 1994, Dr. Terry M. Williams of my staff met with the Operator Licensing Branch in Region II to informally discuss a proposal for utility developed initial license examinations. The attachment to this letter provides a description of our initial license development proposal along with a justification.

I would like to offer Surry and/or North Anna Power Station as pilot sites for the purposes of implementing this proposal. Surry is conducting an initial licensing class which will conclude in March of 1995, at which time the NRC is scheduled to administer initial examinations. North Anna will commence an initial licensing class in January, 1995, with a scheduled completion date of January, 1996. If you concur with our proposal, I will designate members of my staff to work closely with the assigned Chief Examiner to develop and refine this process.

This action is being submitted as part of our Cost Beneficial Licensing Actions (CBLA) program and complies with the NRC guidelines for consideration as a CBLA. Should you have any additional questions or concerns, please contact Dr. Terry M. Williams at (804) 273-2701.

Very truly yours,


James P. O'Hara
Senior Vice President - Nuclear

Attachment

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cc:

~~United States Nuclear Regulatory Commission~~
Attention: Document Control Desk
Washington, D. C. 20555

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Mr. M. W. Branch
Senior Resident Inspector
Surry Power Station

Mr. R. D. McWhorter
Senior Resident Inspector
North Anna Power Station

**PROPOSED REVISIONS TO THE PROCESS FOR
NRC INITIAL LICENSE EXAMINATIONS**

Virginia Power recommends the following changes to the NRC initial license examination process:

1. The utility will be responsible for developing the Operating Test [Job Performance Measures (JPM) in support of Plant Walkthrough and Simulator Scenarios] and Written Test in accordance with NUREG-1021 & BR-0122 requirements.
2. Facility representatives who acquire specific knowledge of the initial license examination material will be required to comply with the "Examination Security Agreement" as described in NUREG-1021, Section ES-201.
3. The NRC's Chief Examiner will review and approve the Operating Tests and Written Test at least 4 weeks prior to examination administration.
4. The NRC will administer the examination (Operating and Written) to each licensee with minimum utility interface. The utility will provide support during the simulator scenarios by initial simulator setup, running of the simulator for each scenario and responding as outside plant operators as described in NUREG-1021, Section ES-302.
5. The NRC will grade each area and make the ultimate pass/fail determination as described in NUREG-1021, Section ES-303 & 403.

Recommendation 1: The utility will develop initial exam material.

Standard: IAW ES-301 (Operating Test) and ES-401 (Written Test) & BR-0122 (Examiner's Handbook) Criteria

Operating Test Development

The operating test to the extent applicable, will require the applicant to demonstrate an understanding of, and ability to perform, the actions necessary to accomplish a representative sample from among the 13 items identified in 10 CFR 55.45(a).

These examination materials will be developed in accordance with the criteria stated in ES-301, Preparing Licensing Tests for License Applicants at Power Reactor Facilities, which captures the requirements of 10 CFR 55.45(a) & (b).

Recommendation 1: (continued)

Written Test Development

The content of the written licensing examinations for ROs and SROs is dictated by 10 CFR 55.41 and 55.43. Each examination shall contain a representative selection of questions on knowledge and abilities (K/As) needed to perform the duties at the desired license level.

The written exams will be constructed in accordance with the criteria stated in NUREG/BR-0122, "Examiner's Handbook for Developing Operator Licensing Written Examinations."

Recommendation 2: Examination security requirements will be complied with.

Standard: IAW ES-201, Preexamination Activities for Initial Examinations at Power Reactors Criteria

Security Agreement

The training staff who develop the proposed NRC examination must meet the requirements of the security agreement as stated in Form ES-201-2, Examination Security Agreement.

Recommendation 3: The NRC will review and approve examination material 4 weeks prior to administration.

Standard: IAW ES-201, Preexamination Activities for Initial Examinations at Power Reactors Criteria

Examination Approval

The chief examiner will make arrangements with the facility licensee to review the initial licensing examination before they are administered. This review will normally be conducted 4 weeks before the week in which the examinations are scheduled and should include all sections of the licensing examination (i.e., the written examination(s), the simulator scenarios, and the walkthrough JPMs).

The NRC chief examiner or his designee will review the examination material and make his recommended changes and/or comments to facility representatives. The examination material will be revised accordingly based on a mutual consensus between the chief examiner and facility representative.

Recommendation 4: The NRC will administer the initial licensing examination.

Standard: IAW ES-302, Administering Operating Tests to License Applicants at Power Reactors, & ES-402, Administering Written Examinations at Power Reactors Criteria

Examination Administration

Initial licensing examinations will continue to be administered to license applicants by NRC personnel in accordance with NUREG-1021, Section ES-302 (Operating Test) & 402 (Written Test). The facility will continue to provide facility operators in support of the simulator portion of the operating test.

Recommendation 5: The NRC will grade examinations and make pass/fail determination.

Standard: IAW ES-303, Documenting and Grading Operating Tests Administered at Power Reactors, & ES-403, Grading Written Examinations at Power Reactors Criteria

Examination Grading

The chief examiner shall evaluate and grade the applicant performance during the Operating Test portion of the license examination in accordance with NUREG-1021, Section ES-303. The written portion of the examination will be graded in accordance with NUREG-1021, Section ES-403.

Any inaccurate or ambiguous examination material (simulator scenario, walkthrough, JRFs, or written tests) discovered during the grading of the examination will be fed back to the utility for corrections.

**JUSTIFICATION FOR REVISING THE PROCESS FOR
NRC INITIAL LICENSE EXAMINATIONS**

1. The same justification used for utility administered requalification examinations (Federal Register Vol. 59 No. 27 dated February 9, 1994) can be used to justify utility developed and NRC administered initial examinations. Existing regulations have established a high standard of licensee performance. NRC examiners are duplicating tasks that are already required of, and routinely performed by, facility licensees.

2. Operator training programs have been developed over the years utilizing the SAT approach. These programs are maintained up-to-date and must undergo INPO accreditation every four years. Surry and North Anna have just completed the third round of Accreditation Review with no findings for all of the Operations Training Programs.

3. Virginia Power has been developing similar license examinations (audit examinations) as a means of screening potential license candidates prior to NRC examination. The quality of our examination and screening process is evident based on our results in recent NRC administered exams. (1991 through 1993 the number of candidates and the number licensed - NAPS 38/38 and SPS 34/31)

4. The current process for developing initial license examinations is inefficient for both the utility and the NRC. The use of contractors by the NRC to develop examinations is not cost effective. The utility can create an equivalent quality examination at lower cost. Furthermore, this change in the initial license examination development process is administrative in nature and will not impact nuclear safety.

5. The proposal represents a Cost Beneficial Licensing Action consistent with NRC guidelines. In 1993, actual NRC contractor charges to support initial examinations at North Anna was \$104,165 and \$87,472 at Surry for a total of \$191,637. We estimate that an average of \$67,500 per station could be saved for each initial license class by implementing the proposed approach to initial licensing examinations .