

NOV 2 1989

Docket Nos. 50-352
50-353

Philadelphia Electric Company
ATTN: Mr. C. A. McNeill, Jr.
Executive Vice President
Nuclear
Correspondence Control Desk
P. O. Box 7520
Philadelphia, PA 19101

Gentlemen:

SUBJECT: REQUALIFICATION PROGRAM EVALUATION

In a telephone conversation between Allen Howe, Senior Operations Engineer and Bob Nunez, Supervisor, Operations Training, arrangements were made for an evaluation of the requalification program and licensed personnel at the Limerick Generating Station. The evaluation visit is scheduled for the week of January 29, 1990.


For this visit, the NRC examiners will administer the operating and written examinations. The NRC examiners will discuss with the appropriate facility personnel and operators the schedule and the process for these examinations. 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." Mr. Nunez has been advised of our reference material requirements and where they are to be sent.

NRC reserves the right to postpone NRC administered requalification examinations if the facility generated materials are inadequate for examination preparation.

It is requested that an employee be provided to complete the examination team. The employee shall be an active (per the requirements of 10 CFR 55.53(e) or (f)) SRO from the Operations Department. If desired by the facility, and agreed to by the Chief Examiner, an additional employee from the Training Department may be a member of the examination team. This employee shall preferably be an active (per the requirements of 10 CFR 55.53(e) or (f)) SRO, but may be a facility or INPO certified instructor. These individuals must not be scheduled for an NRC administered examination during this visit, or participate as instructors once selected. The facility representatives will be required to certify that they did not knowingly compromise any portion of the examination.

The facility representatives shall be restricted (1) from knowingly communicating by any means the content or scope of the examination to unauthorized persons and (2) from participating in any facility programs such as instruction, examination, or tutoring in which an identified requalification examinee(s) will be present. These restrictions shall apply after their first involvement with the examination or knowledge of its content.

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In addition to these individuals, the assignment of a simulator operator is requested 14 days prior to the scheduled examination date. The simulator operator will be under examination security restrictions similar to those above, except that his/her restrictions shall apply from 14 days prior to the examination date.

The facility management is responsible for providing adequate space and accommodations to properly develop and conduct the examinations. Enclosure 2, "Administration of Requalification Examination," describes our requirements for developing and conducting the examinations. Mr. Nunez 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. The requalification examinations and the subsequent evaluation of the facility requalification program will be performed in accordance with ES-601.

This request is covered by Office of Management and Budget Clearance Number 3150-0101, which expires May 31, 1992. The estimated average burden is 7.7 hours per response, including gathering, xeroxing 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 Records and Reports Management Branch, Division of Information Support Services, Office of Information Resources Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555; and the the Paperwork Reduction Project (3150-0101), Office of Management and Budget, Washington, D.C. 20503.

Thank you for your consideration in this matter. If you have any question on the evaluation process, please contact the undersigned at (215) 337-5210.

Sincerely,

Original Signed By:

for *Tracy E. Walker*
Richard J. Conte, Chief
BWR Station
Operations Branch
Division of Reactor Safety

Enclosures:

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

cc w/encls:

E. C. Kistner, Chairman, Nuclear Review Board
J. S. Kemper, Sr., Senior Vice President - Nuclear Construction

cc w/encls. (cont'd.):

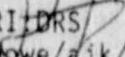
G. M. Leitch, Vice President - Limerick Generating Station
S. J. Kowalski, Vice President - Nuclear Engineering
D. R. Helwig, General Manager - Nuclear Services
M. J. McCormick, Jr., Manager - Limerick Generating Station
W. T. Ullrich, Manager - Limerick Unit 2 Startup
A. S. MacAinsh, Manager - Limerick Quality Division
G. A. Hunger, Jr., Director - Licensing Section
E. Firth - Training Manager
T. B. Conner, Jr., Esquire
E. J. Bradley, Esquire, Assistant General Counsel
H. D. Honan, Branch Head - Nuclear Engineering Licensing
Public Document Room (PDR)
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Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania


bcc w/encls:

Region I Docket Room (with concurrences)
J. Dyer, EDO
Section Chief, DRP
D. Florek, DRS
OL Plant File
DRS Files (3)

bcc w/o encls:

Management Assistant, DRMA


RI:DRS
Howe/ajk/dmg
11/1/89


RI:DRS
Conte
11/2/89

ENCLOSURE 1

REFERENCE MATERIAL REQUIREMENTS

For the written examination, the following items must be provided to the NRC 60 days prior to the examination date:

1. Proposed RO and SRO requalification examination test items (a minimum of 250 per section of the examination).

Since the written examination is completely open reference, examination items must meet the following:

- a. Items that require only memorization or recall are not permitted;
- b. Items should require that the examinee comprehend, interpret, integrate, or apply available information;
- c. Items should contain situations, aspects, or conditions that do not duplicate lesson plans or references; and
- d. Items should require examinees to locate and use references.

The written examination will be composed of two sections, each designed to be completed in 1-1/2 hours. Each section will be separate. Section A will be administered on a static simulator; Section B will be administered in a classroom setting. Section A is designed to evaluate the operator's knowledge of plant systems, integrated plant operations, and instrumentation and controls. In addition, recognition of Technical Specification LCOs and the operator's ability to diagnose postulated events should be evaluated. Section B of the written examination is designed to evaluate the ability of the operator to analyze a given set of conditions and determine the proper procedural and/or administrative guidance.

2. All reference material and objectives for the proposed test items.

For the simulation facility, the following items must be provided to the NRC 60 days prior to the examination date:

1. A minimum of 15 scenarios

The scenarios should sample areas such as LERs, emergency and abnormal procedures, and design and procedural changes that exercise the crew's ability to use facility procedures in accident prevention and mitigation. The scenarios should evaluate each crew member as appropriate to his/her license, and shall exercise their abilities in the use of Emergency Operating Procedures, Technical Specifications, and the Emergency Plan.

The scenario's net time (not including time spent on briefings, setup or simulation facility problems) should average 50 minutes, based upon real time performance.

For the plant walk-through examination, the following items must be provided to the NRC 60 days prior to the examination date:

- (1). A list of systems and topics appropriate to the plant walk-through examination that were covered during the requalification cycle. All reference material required to support an examination on these topics should be provided.
 - (2) Seventy (75) job performance measures

These performance measures should be in-plant operator functions, that are required for the safe operation of the facility. They shall include acceptable performance criteria.
 - (3) If additional reference material is required for examiner preparation, it will be requested during the pre-examination site visit.
3. A sampling plan shall be provided by the facility which indicates the relative emphasis of topics which were included in the most recent requalification training cycle.

ENCLOSURE 2

ADMINISTRATION OF REQUALIFICATION EXAMINATIONS

1. Twenty percent of the facility licensed operators shall be selected for evaluation. Normally, the crew currently in the requalification cycle will be selected. A random sample without replacement will be used to preclude a satisfactory operator from being subject to the re-examination by the NRC during the term of the license. The sample will include other shifts made up of licensed personnel who are not routinely performing shift duties.
2. The simulator and a simulator operator(s) will 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 made available 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 during the duration of the examination.
5. Minimum spacing is required to ensure examination integrity as determined by the chief examiner. Minimum spacing should be one candidate per table, with a three-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 will be provided for each candidate. The reference material will be reviewed by the chief examiner and will consist of Technical Specifications, operating/abnormal procedures, administrative procedures, Emergency Plans as available to the plant operators.
7. Video taping capabilities can be utilized. The facility should contact the chief examiner for restrictions related to its usage.
8. Since common tasks and detailed systems knowledge will be probed during the walk through portion of the operating test, operators will be requested not to discuss the walk through with other examinees until after the complete examination has been administered.
9. 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.

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. Partial credit may be given for other than multiple choice questions. Therefore, ANSWER ALL PARTS OF THE QUESTION AND DO NOT LEAVE ANY ANSWERS BLANK.
10. Partial credit will NOT be awarded for questions using multiple choice selection formatting. The correct answer must stand on its own merit.
11. If parts of the examination are not clear with respect to their intent, ask questions of the examiner only.
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. Restroom 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 for a total of four hours. Each question has been time validated, with

the allotted time based on an average of knowledgeable persons answering the question. You should be aware that the times DO NOT allow for looking up or verifying each answer.

16. 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.
17. When you are finished and have turned in your completed examination, leave the examination area.
18. 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 of your responses 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 instead of 1.00 even though you got the four correct answers.