



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUL 30 1992

MEMORANDUM FOR: Albert F. Gibson, Director
Division of Reactor Safety, RII

FROM: Jack W. Roe, Director
Division of Licensee Performance
and Quality Evaluation, NRR

SUBJECT: ANNUAL PROGRAM REVIEW OF THE OPERATOR
LICENSING FUNCTION IN REGION II

During the week of April 6, 1992, the Operator Licensing Branch (LOLB) reviewed the administration of the operator licensing function in Region II. Jim Caldwell, Chief, Non-Power Reactor Section, LOLB, was the team leader and he was assisted by Beth Wetzel, Examiner, LOLB; Doug Shepard, Chief Examiner, Region III; Kriss Kennedy, Chief Examiner, Region IV; and Debra McCain, OLA, LOLB. Dave Lange, Chief, Program Development and Review Section, LOLB, joined the team on April 9, for the exit meeting.

The review team evaluated the Region's adherence to the Examiner Standards and other program guidance and the effectiveness with which the Region has implemented the operator licensing program. LOLB Manual Chapter 310 was used in performing this review. The review also followed-up on the site evaluations conducted at Turkey Point and Grand Gulf for initial examinations during the weeks of September 30, 1991, and January 27, 1992, respectively and Turkey Point for requalification examinations during the weeks of February 10 and March 2, 1992. Those reviews were conducted in accordance with LOLB Manual Chapters 320 and 330 and documented in memoranda dated November 15, 1991, March 9, 1992, and June 14, 1992, respectively.

The regional operator licensing functions evaluated during this review were implemented satisfactorily. With a few exceptions, the program was in compliance with the requirements of Revision 6 of the Examiner Standards. The exceptions mainly involved the region's pre- and post-examination review process. Three examinations (Oconee, Grand Gulf and Browns Ferry) had indications of weak pre-examination reviews as evidenced by the number of legitimate pre- and post-examination facility comments. Additionally, the

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number of appeals of license denials which were overturned has increased. As a result, the region has initiated a self-assessment of their examination review practices and developed corrective actions which should improve this process.

Our review of the implementation of requalification examinations indicated a potential concern regarding the number of requalification examinations scheduled for FY 92. The total number of requalification examinations expected to be completed in FY 92 is significantly below the budgeted goal. Region II is requested to review this issue and provide NRR the results of that review. Specific details of the review are enclosed.

If you have any questions concerning the review results, please call me or Robert Gallo at 301-504-1004 and 301-504-1031, respectively.

Original signed by

Jack W. Roe, Director
Division of Licensee Performance
and Quality Evaluation, NRR

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As stated

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TECHNICAL FINDINGS

The review team evaluated three initial examinations (Grand Gulf, Oconee and McGuire) and three requalification examinations (Surry, North Anna and Sequoyah) that were administered by the region during the review period. The examinations were evaluated to verify compliance with the Examiner Standards (ES) with respect to preparation, administration, and grading. The examinations, with some exceptions, were found to be of good quality as well as meeting the guidance in the Examiner Standards.

Examination Administrative Requirements (Attachment 2)

The administrative requirements of the initial examination process were generally conducted in accordance with the Examiner Standards and implemented in a satisfactory manner. However, some minor administrative items were identified. These were:

- o Two Security Agreements (ES 201, Attachment 1, Enclosure 4) for the Oconee examination did not have the post-exam signatures dated.
- o The as-run simulator scenarios were missing from 2 out of 13 master examination files that were sampled (McGuire and Surry). The region subsequently notified the audit team leader that the principal examiner had the copies of the as-run scenarios for McGuire and has now placed them in the McGuire examination file.
- o In one master examination file reviewed (McGuire) the master SRO written examination did not reflect post examination changes. However, the individual examinations were graded incorporating the changes.

Operating Test Review (Attachment 3)

A review of the operating tests administered by the region indicated satisfactory compliance with the Examiner Standards. However, one discrepancy was identified concerning the McGuire examination. This discrepancy involved four 157 forms (Operator License Examination Report) which did not indicate the minimum coverage for the Abilities subject area on part B of the operating test as required by the standard. All candidates passed this portion of the examination; however, a failure would have been more difficult to sustain since the examination was not in complete compliance with the standard.

Written Examination Review (Attachment 4)

The three examinations reviewed were found to be in general compliance with the standards. However two of the three examinations reviewed, Oconee and

Grand Gulf, and an additional examination Browns Ferry, previously identified by the region, provided an indication of problems with the pre-examination review process.

The two exams reviewed contained a high number of post-examination facility comments (14 and 15). Reasons for the high number of comments involved the quality of the contractor, NRC and facility pre-examination reviews and the preparer (contractor) in one case to incorporate all of the facility proposed changes. For these two examinations, 7 out of 14 and 11 out of 15 of the post examination facility comments were accepted by the NRC. The post-examination changes did affect pass/fail decisions.

In the case of the Browns Ferry examination, the contractor preparation and review of the written examination was such that the examination was considered by the region to be unsuitable for administration, causing the written examination to be delayed approximately three weeks while it was re-written. The problems with the examination were identified by the staff and the facility during the parallel pre-examination review. The region had not reviewed the examination prior to the facility review because of the two week late examination submittal by the contractor and the region's workload at the time.

Requalification Program Review (Attachment 5)

Each of the region's facilities has received a requalification program evaluation within the past two years. The number of operators examined in FY 91 exceeded NRR's budgeted goal of 276. However, the number examined during the first half of FY 92 was 43, below NRR's budgeted goal of 168 or 28 per month. The number of examinations scheduled for the remaining 6 months of FY 92 is about 160. Therefore, the total number of requalification examinations expected to be completed during FY 92 is about 200, significantly below the budgeted goal of 336. The region has developed a manual tracking system which should enable them to ensure that each licensed operator receives a requalification examination within the term of his or her six year license.

The examination packages reviewed were found to be of good quality, with only the following minor discrepancies:

- o One requalification exam (Surry) had 26 security agreements signed. The Examiner Standards place no limit on the use of the security form agreements; however, the Examiner Standards recommend a cautionary usage of this practice. ES-601 states that "To the maximum extent possible only the examination team members and a simulator operator should be given specialized knowledge (of the contents of the NRC administered requalification examination)."
- o One requalification examination (Sequoyah), did not have documentation in one operator's docket file that he had partially completed a requalification exam. He completed and passed the written exam and then withdrew due to illness. The team leader

was subsequently notified by the region that although the information should have been in the individual's docket file it was contained in the examination file.

ADMINISTRATIVE FINDINGS

The review team evaluated the administrative aspects of the operator licensing process. This review included examiner training, operator licensing tracking system (OLTS) activities, record/docket maintenance and the handling of appeals and waivers. Regional performance in these areas was considered to be excellent.

Review of Correspondence and Transmittals (Attachment 6)

Interaction between the region and headquarters was discussed with regional supervision and several examiners. The level of support and responsiveness to the region's requests and queries was perceived as very good especially headquarter's support related to the fitness-for-duty problems. There were some discussions which indicated that the region would like more frequent communication with headquarters and that they have had some problems with getting timely notification of contractor support.

Review of OLTS Entries (Attachment 7)

A random sample of 25 dockets was reviewed. No data entry errors were found in any of the docket files. All docket files and correspondence were easily located and well organized. The Licensing Assistant (LA) is to be commended for her proactive approach in this area.

Review of Licensing Assistant (LA) Activities (Attachment 8)

All docket and license logs were completed and up-to-date.

Review of Medical Examinations (Attachment 9)

All NRC Form 396 data reviewed was found to be accurate and current. All reviewed licenses stated medical license restrictions in an accurate and appropriate manner.

One issue discussed involved the lack of a system for tracking individuals with disabilities. According to the region the need for such a system had not been identified because the region had not had any licensed operators with disabilities which needed to be tracked. The LA is now aware of the need for a system to track individuals with disabilities, e.g., individuals requiring blood pressure checks every six months.

Review of Examiner Training Program (Attachment 10)

Examiner training and qualification actions meet the requirements of the Examiner Standards. A sample review of two examiner Qualification Journals indicated compliance with OLB-MC-170. Examiner audits and refresher training

are being completed within the required intervals with one exception; one examiner went 23 months without an audit, but is now current.

Review of Manpower Resources and Utilization (Attachment 11)

Region II, while meeting the program objectives for initial examinations, is below the NRR budgeted goal for requalification examinations. However, the region is monitoring the operators whose license expiration dates are in the near term to ensure that these operators are administered requalification examinations prior to their expiration dates.

Contractor resource usage for the first half of the fiscal year was 37%, somewhat below the stated minimum goal of 40%. Part of the problem causing the low contractor usage was the region's inability to obtain requested contractor support for three examinations near the end of the assessment period.

Interviews with the examiners indicate that contractor performance is not always up to their expectations. This, however, is not always reflected on the contractor evaluation forms (examples discussed below). One examiner suggested that the evaluation forms not be completed until the examination process has been completed. This provides indication that the evaluation forms may be completed too early in the process to ensure adequate evaluation of contractor performance.

The Region has been very supportive of the LOLB sponsored examiner interchange program and LOLB rotational assignments. The Region also has provided the examiners with opportunities to participate in other regional initiatives and inspections, thus leading to potential career advancement.

Review of Region Operating Practices (Attachment 12)

Regional performance in this area is current and in compliance with existing standards and guidance with the following exceptions identified during interviews with the Branch Chief, Section Chiefs and examiners:

- o Section Chiefs are not normally reviewing examinations prior to the facility pre-examination review.
- o Changes to the requalification examinations are normally made during the preparation week instead of prior to the preparation week.

The region's examination scheduling system was acceptable, and the contractor requests made to LOLB were timely. The region has not issued any examiner guidance at variance with current LOLB guidance.

Contract monitor forms are completed and forwarded to headquarters. Two contractor evaluations did not reflect the fact that numerous post examination changes were made to the written examinations which were developed by the contractors. This indicates that at least in these two instances the evaluation forms did not accurately reflect contractor performance.

A sample of the processed waivers indicates the regional actions to be in accordance with the Examiner Standards, with one exception; one waiver denial was not documented on NRC Form 398. Applicants were formally notified of the final resolution to their waiver requests.

Review of License Denial and Appeal Process (Attachment 13)

The region's denial and appeal process, although generally in compliance with the Examiner Standards, appears to need some management attention. The region issued 12 denials during the assessment. Six of these denials were appealed and all six were overturned. The region initiated a self-assessment of the overall initial examination process, including the post examination review of license denials. This assessment identified an upward trend in appeals which were overturned and recommended several corrective actions which should improve performance in this area.

The LA accurately reflected the required information on all 12 denials in OLTS and in the individual docket files.

Examination Question Bank (EQB) Usage (Attachment 14)

Fourteen personal computers were available for use by the examiners with five of these having the capability to access the EQB. Personnel were familiar with the basic procedures for use of the EQB and for using the EQB to perform remote communications with the national labs.