

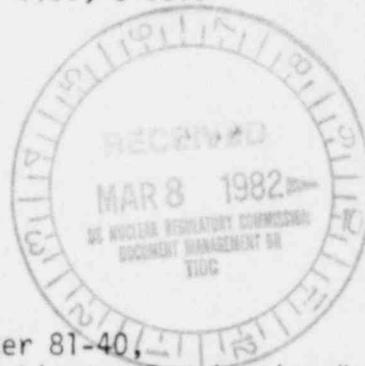
The Light company

Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

March 2, 1982
ST-HL-AE-794
SFN: V-0100, C-0510

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Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555



Dear Mr. Eisenhut:

Comments on Generic Letter 81-40,
"Qualifications of Reactor Operators-License Examinations"

Houston Lighting & Power Company has reviewed Generic Letter 81-40 and wishes to make the following comments:

- 1) The third paragraph states that a six-hour time limit will be imposed and that weight given to theory is reduced to about 25%, thus making the examination less of a "writing marathon." However, the amount of writing required is a function of the way in which the questions are asked, not the subject material. Establishment of a six-hour time limit will not necessarily improve the quality of licensed individuals because an operator's job does not require the ability to write organized responses in a limited time period.
- 2) Appendices B and D outline the contents of each category using statements such as the following:
 - a) "...be able to reproduce, from memory, fairly detailed sketches..." (p.7)
 - b) "...to the extent they are directly applicable..." (p. 9&17)
 - c) "...usually need not be committed to memory..." (p. 13)
 - d) "...pertinent provisions of 10 CFR Part 50 Part 55..." (p. 19)

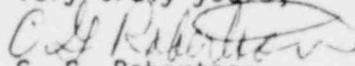
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Evaluation of the depth of knowledge which will be required is difficult in the face of statements that are this vague. Furthermore, creating a plant training program with established minimum levels of knowledge in each area is hindered by the difficulty in discerning from statements such as these exactly what will be required. It appears that the depth of knowledge required will be, to a significant extent, determined subjectively by the examiner.

- 3) HL&P recommends that the new examination not be implemented without a controlled, valid trial and comparison period. After this period an implementation date should be set to allow an appropriate period for familiarizing potential examinees with the categories and their content. To compare the proposed examination to the one presently in use, the following program is suggested:
 - a) Identify two unit plants for each NSSS vendor type.
 - b) Quantify operating mistakes committed by operators assigned to each unit over the past twelve months.
 - c) Implement the new examination format as a requalification examination for operators on one of each pair of units.
 - d) Quantify operating errors for each unit for another twelve month period.
 - e) Compare the results of (2) and (4) for each pair of units.
- 4) No written examination alone can fully assure well-qualified licensed operators. The content of the examination and its applicability to the job are the measures of the value of the examination as an aid in assuring well-qualified operators. Examination length, time limits, and format are of far less importance.

Very truly yours,



C. G. Robertson

Manager

Nuclear Licensing Department

PLW/bai

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STP RMS