

PDR



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20565

November 16, 1990

Mr. Carl M. Gray, President
Professional Reactor Operator Society
1015 Nuclear Road
Mishicot, Wisconsin 54228

Dear Mr. Gray:

I am writing to acknowledge receipt of your letter of September 20, 1990, and to thank you for the opportunity to address your organization. I found the experience of speaking to the Professional Reactor Operator Society (PROS) very enjoyable. In that regard, I have attached supplemental responses to specific questions asked at the July 21, 1990 meeting (as reported in your recent newsletter) and other information relevant to those questions. In addition, I have enclosed a copy of the Chernobyl Notebook referred to during the meeting.

The Commission appreciates the concerns you conveyed in your letter regarding the administration of requalification examinations. I know you recognize that a certain amount of stress can be expected from any testing process or emergency operational situation. Nevertheless, our headquarters Operator Licensing Branch is continuing to work with our regional offices and the industry to eliminate any unnecessary pressure that might be placed on reactor operators during the examination process. The Nuclear Regulatory Commission (NRC) staff is also committed to the identification and resolution of inconsistencies in the operator licensing examination process and appreciates the feedback that facility representatives and operators have provided in this area.

You also expressed a desire to establish a working relationship between your organization and the NRC. We agree that continuing communication would be mutually beneficial, and have requested Mr. Jack Roe, the Director of the Division of Licensee Performance and Quality Evaluation, to contact you to discuss improving communication channels.

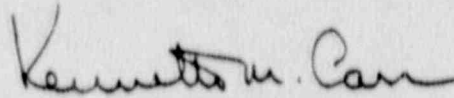
Your comments have helped to focus attention on the importance of stability and consistency in the examination process to eliminate unnecessary stress experienced by reactor operators during examinations. The NRC staff appreciates your constructive feedback and will follow up to both correct inconsistent examination practices and improve the quality of the NRC requalification examination.

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I want to commend the Society for the significant contribution it is making toward promoting professionalism in reactor operators and look forward to future interactions with PROS.

Sincerely,

A handwritten signature in cursive script that reads "Kenneth M. Carr". The signature is written in dark ink and is positioned above the printed name.

Kenneth M. Carr

Enclosures:
As stated

Responses to Questions to Chairman Carr
at the
Professional Reactor Operator Society (PROS) Meeting
Boston, Massachusetts
July 21, 1990

Question: In 1984, the NRC did a study on ways of getting direct operator feedback. Apparently, this study did not go very far because utilities did not want that kind of relationship between the operators and the Commission. What happened to that study?

Answer: The NRC conducted three Operator Feedback Workshops in Chicago, Boston, and Atlanta during the period December 1981 to May 1982. A fourth workshop was planned, but was never held for several reasons. Participation was limited (a total of 60 attendees, representing about 38 plant sites), and a mail survey technique had been developed that provided a more cost-effective method of receiving operator feedback. The reports of both feedback efforts are enclosed. (NUREG/CR-3739, "The Operator Feedback Workshop: A Technique for Obtaining Feedback from Operations Personnel," and NUREG/CR-4139, "The Mailed Survey: A Technique for Obtaining Feedback From Operations Personnel.").

In 1989, a broad-based Regulatory Impact Survey was conducted by NRC teams going to 13 utilities and talking with operators, engineers, managers, and CEOs about their perceptions of the NRC. A draft report on the results of the survey was published as NUREG-1395. On page xxx of the report, the staff noted that "Operators had strong views on the need to further improve the quality of operator licensing examinations; the continuing changes to and stress associated with the operator licensing training and examination process; the complicating effects that continuing plant modifications have on operator performance; the burden resulting from the complexity and ambiguity of Technical Specifications; and the unnecessary burden of reporting events of marginal safety significance." The staff also noted in their initial assessment of the summary (page xvi of NUREG-1395) that "licensees stated that operators are not permitted to function in the simulator examination process as they normally function while on shift, examiner standards are continually changing and not uniformly implemented, and too many organizations are involved in the requalification process." (Copy of NUREG-1395 and SECY-90-080, Marc. 3, 1990, enclosed.)

In 1990, a specific survey of use of management time was conducted via Generic Letter No. 90-01, January 18, 1990. Forty-four out of fifty-four utilities responded. The results of this survey were reported to the Commission in SECY-90-205. (Copy of Generic Letter and SECY-90-205, June 7, 1990, enclosed.) The Commission has considered the results obtained from these surveys, as well as from a companion survey of the NRC staff (SECY-90-250, July 16, 1990, enclosed), and intends to issue the staff's recommended corrective actions for public comment. A copy of the staff's recommendations, as contained in SECY-90-347, is enclosed.

Question: Under Rev. 5, NUREG 1021, Examiner Standards, it was quite clear that any questions asked in the field by the NRC examiner or the facility had to be pre-approved by the exam team, which consisted of an operator, a trainer, and a NRC member. The current revision, which you said takes effect in October, now gives the NRC team carte blanche to ask any question without this prior approval to make sure the exam stays operational oriented as it has in the past. Based on your comments, do you think this is the right way to go?

Answer: In the area of examination question reviews, the Examiner Standards did not change significantly with Revision 6. Written examination questions are selected mostly (or entirely) from the facility examination bank. Any questions that are changed by the NRC are reviewed by the facility representative on the Examination Team. The Team, including the facility representative, then reviews the complete examination before it is administered. In requalification examinations, the NRC role is essentially passive during simulator and walk-through portions, which are conducted by the facility evaluator. NRC examiners are only to ask clarifying questions.

Question: Earlier you mentioned teamwork among the crews. Opposed to that is the adversarial relationship between the operators and the NRC. There appears to be very little teamwork between the reactor operators and the Nuclear Regulatory Commission. We generally hear about NRC rules, desires, or needs in quite round about ways. My experience is that every time this information takes a circuitous path, the message gets changed. Could there be more straight forward interaction between the operators and the NRC without the interference of management?

Answer: NRC maintains a mailing list of home addresses for SRO and RO license holders. Mass mailings to operator licensees have been made about once per year. The Staff has been alerted to identify items of interest to operators in the future and to send such items to the mailing list. One recurring problem with this system has been a significant rate of undeliverable mail as a result of operators not keeping NRC informed of address changes. This has become increasingly prevalent since the license term went to six years as opposed to two years. PROS could help by requesting operators to keep NRC informed of address changes.

Question: This is just a comment. The worst thing the NRC did for the operators was regionalize the examination process. When the exam came from headquarters, there was more consistency. We had an exam team that included examiners from two different regions, and the perspective of what was supposed to be done was at opposite ends of the spectrum. This made getting the job done very difficult. Having given exams before from headquarters was a much easier process.

Answer: On June 11, 1990, the Annual Examiners Conference was held in Region V. All examiners were required to attend. They were brought up to date on Rev. 6 of the Examiner Standards, and minimizing inconsistencies was stressed.

There is also a weekly conference call with all five NRC Regions to keep them current and to minimize inconsistencies. All examiners are requested to attend these weekly conference calls. Also, minutes of these calls are published and sent to each examiner.

In addition, there is a quarterly counterpart meeting where Branch Chiefs and Section Chiefs from all NRC Regions get together with Headquarters Branch Chiefs and Section Chiefs to discuss program guidance and policy.

The Operator Licensing Branch at NRC Headquarters has a Qualification Journal, which contains study requirements and training and qualifications requirements for each new NRC examiner. This provides a consistent approach to train NRC examiners.

As a footnote, about 50% of all NRC examiners have been SROs.

Enclosures:

1. NUREG/CR-3739
2. NUREG/CR-4139
3. NUREG-1395
4. SECY-90-280
5. Generic Letter 90-01
6. SECY-90-201
7. SECY-90-250
8. SECY-90-347