

April 1, 1994

Docket No. 50-440
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Centerior Service Company
ATTN: Mr. Robert. A. Stratman
Vice President
Nuclear - Perry
P.O. Box 97, S 270
Perry, OH 44081

Dear Mr. Stratman:

SUBJECT: REQUALIFICATION RETAKE EVALUATION

In a telephone conversation on April 1, 1994, Mr. C. Persson, Operator Training Supervisor, and Mr. M. Bielby, Principal Examiner, arranged to evaluate one requalification retake examination of scenarios for a crew at the Perry Nuclear Plant who previously demonstrated unsatisfactory performance of same during a requalification examination the week of January 31, 1994. The evaluation is scheduled for the week of August 29, 1994. NRC examiners and evaluators from your facility will conduct the retake examination in accordance with Sections ES-601, ES-604, ES-605 of NUREG-1021, "Operator Licensing Examiner Standards," Revision 7. You are encouraged to ensure that your training staff and proposed examinees are familiar with these standards.

You are requested to submit a proposed scenario examination for use during the retake examination. If you do submit a proposed scenario examination, the personnel participating in its development may become subject to the security restrictions described in this letter. If a proposed scenario examination is not submitted, the facility licensee will need to furnish the NRC the approved items listed in Enclosure 1, "Reference Material Guidelines" for the NRC to adequately prepare for this evaluation.

Please review the guidance promulgated in Revision 7 to NUREG-1021 on the content and scope of simulator examination scenarios. Each scenario should contain simultaneous events that require the senior reactor operator (SRO) to prioritize his/her actions and to assign other crew members particular tasks. Each scenario should also require the SRO to decide when to transition between Emergency Operating Procedures (EOPs) and decide which actions to take within the EOPs.

You are requested to designate at least one employee to be a member of a joint NRC-facility examination team. The employee is expected to be an active senior reactor operator (SRO) as defined by 10 CFR 55.53(e) or (f) from the Perry Nuclear Plant operations department. You are encouraged to designate a second employee from the training staff to be a member of the examination team. This employee should also be a licensed SRO, but may be a certified

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instructor. If desired and agreed to by the chief examiner, you may designate one additional employee from the training staff with appropriate qualifications to be a member of the examination team. In addition to these individuals, you will need to designate a simulator operator for scenario validation. All of these individuals will be subject to the examination security agreement.

The NRC restricts any facility representatives under the security agreement from knowingly communicating by any means the content or scope of the examination to unauthorized persons and from participating in any facility licensee programs such as instruction, examination, or tutoring in which an identified requalification examinee will be present. These restrictions apply from the day that the facility licensee representative signs the examination security agreement indicating that the representative understands that he or she has specialized knowledge of the examination. The chief examiner will determine when a facility licensee representative has received specialized knowledge concerning the examination and will execute an examination security agreement. In most cases, the examination team members will not be required to enter into an examination security agreement more than 60 days prior to the examination week. The simulator operator will normally become subject to the security restrictions during validation of the scenarios.

Sixty days before the examination administration date, please provide the NRC regional office with the name of the retake licensees' for the scenario examination. The facility licensee training staff should send this information directly to the NRC's chief examiner.

The facility licensee may request that the NRC Chief Examiner or another NRC representative meet with the licensees to be examined and the licensee managers before the retake examination week at any mutually agreeable time. The NRC examiner will explain the examination and grading process, and will respond to any questions the licensee may have about the NRC's examination procedures.

The facility licensee is requested to distribute the, "Requalification Examination Feedback Form," attached as Enclosure 3. The NRC requests that this feedback form be completed by all operators, evaluators, and facility licensee representatives participating in the NRC requalification retake examination, including facility licensee managers. The results from this survey will be used to measure the success of the NRC and facility licensee's efforts to reduce undue stress during the requalification retake examination.

The facility licensee staff is responsible for providing adequate space and accommodations to properly validate and conduct the examinations. Enclosure 2, "Administration of Requalification Examinations," describes our requirements for developing and conducting the examinations. A facility operations management representative above a shift supervisor level should observe the simulator examination process at the site.

April 1, 1994

The request for requalification examination material is covered by Office of Management and Budget Clearance Number 3150-0101, which expires October 31, 1995. The estimated average burden is 7.7 hours per response, including gathering, copying, 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 Information and Records Management Branch, MNBB-7714, Division of Information Support Services, Office of Information Resources Management, U.S. Nuclear Regulatory Commission, Washington, DC 20555; and to the Paperwork Reduction Project (3150-0101), Office of Information and Regulatory Affairs, NEOB-3019, Office of Management and Budget, Washington, DC 20503.

The request for responses to the Requalification Feedback Form is covered by Office of Management and Budget Clearance Number 3150-0159, which expires February 28, 1996. The estimated average burden is 30 minutes per response, including copying and mailing the completed responses. Send comments about 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, MNBB-7714, Division of Information Support Services, Office of Information Resources Management, U.S. Nuclear Regulatory Commission, Washington, DC 20555; and to the Paperwork Reduction Project (3150-0159), Office of Information and Regulatory Affairs, NEOB-3019, Office of Management and Budget, Washington, DC 20503.

Thank you for your cooperation in this matter. Mr. Persson has been advised of the NRC guidelines and policies addressed in this letter. If you have any questions on the evaluation process, please contact Mr. Dell McNeil at (708) 829-9737.

Sincerely,

original signed by B. L. Burgess/for

Mark A. Ring, Chief
Operations Branch

Enclosures:

1. Reference Material Guidelines
2. Administration of Requalification Examinations
3. Requalification Examination Feedback Form

See Attached Distribution

DISTRIBUTION

cc w/enclosure:

R. W. Schrauder, Director, Nuclear
Services Department
H. L. Hegrat, Acting Manager
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Assurance Department
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H. J. Miller, RIII
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R. M. Gallo, Branch Chief, OLB
J. B. Hopkins, Project Manager, NRR
R. D. Lanksbury, Section Chief, DRP

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Jordan
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RIII
BB
Ring
04/1/94

ENCLOSURE 1

Reference Material Guidelines

1. Provide test items to support all aspects of the requalification retake scenario examination to the NRC 60 days before the examination date.

2. The following reference material:

A bank of at least 30 simulator scenarios which reflect all abnormal and emergency situations to which a licensee is expected to respond or control. Emphasis should be placed on scenarios that include applicable industry events.

3. For licensee requalification retake examination evaluation visit, the facility shall:

- Submit an applicable Examination Sample Plan which meets the requirements of ES-601, Attachment 2;
- Provide the associated scenario examination bank and associated reference material. At a minimum, the reference material should include Technical Specifications, abnormal and emergency operating procedures, and emergency plan procedures utilized in the requalification training; and
- Provide additional reference material as requested by the NRC chief examiner.

ENCLOSURE 2

Administration of Requalification Examinations

1. The simulator and simulator operators need to be available for examination development. The chief examiner and the facility representatives will agree on the dates and duration of time needed to develop the examinations.
2. Prudent scheduling of examination week activities is important to help alleviate undue stress on the licensees. The facility training staff and the NRC chief examiner should attempt to formulate a schedule that will minimize delays while conducting the examination.

The following are some suggestions for structuring the examination activities to achieve this objective:

- Bring in licensees in accordance with their scheduled examination times.
- Following simulator scenarios, the facility evaluators and NRC examiners should quickly determine whether follow-up questioning is required so that the crew members may be released to talk among themselves about the scenarios.

ENCLOSURE 3

REQUALIFICATION EXAMINATION FEEDBACK FORM

Introduction

The NRC is requesting feedback regarding the conduct of requalification examinations. The information provided will be used to monitor, on a generic basis, the effectiveness of the NRC's and facility licensee's efforts to minimize undue stress in the examination process.

This form is not intended as a means of resolving technical or process concerns pertaining to a specific examination. Such concerns will be resolved using the guidance in NUREG-1021, "Operator Licensing Examiner Standards."

Instructions

Completion of this form is voluntary. If you choose to provide feedback, please answer the questions in accordance with these instructions:

- The questions in this form regard the examination administered by Region III at the Perry Nuclear Plant during the week of August 29, 1994; however, comparisons with previous examinations may be appropriate.
- Any examinee or individual involved in the development or administration of this examination is encouraged to complete this form.
- Mail completed forms to: U.S. Nuclear Regulatory Commission
Region III
ATTN: Mark A. Ring, Chief
Operations Branch
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Your Background

Please check the boxes that describe your involvement in this examination.

I was:

- an examinee
- involved in developing the examination
- involved in administering the examination
- an examination observer
- other: _____

Please check the boxes that describe your current position.
(Check all that apply)

RO SRO operating crew member
 training department operations department
 other: _____

Stress vs. Undue Stress

The following questions require you to make a judgment of whether there was undue stress during the examination. Examinations are inherently stressful events and, therefore, it is important that you make a distinction between stress and undue stress when making your judgments. Undue stress is unnecessary or inappropriate stress which can be practically eliminated without compromising the validity of the examination. The distinction between stress and undue stress is not a matter of whether the stress was extreme or mild. When making your judgments you should follow these steps:

First, consider the cause of the stress. Would it have been possible and practical to eliminate the cause of the stress without compromising the validity of the examination? If your answer is no, then no undue stress was present. (See point #1 on the rating scale below.)

If your answer is yes, consider the magnitude of the stress. A source of stress may be unnecessary but also sufficiently small in magnitude to be unlikely to affect an individual's performance in the examination. (See point #2 on the rating scale below.) The alternative is that the source may be unnecessary and also of sufficient magnitude to be likely to affect an individual's performance in the examination. (See point #3 on the rating scale below.)

Rating Scale:

1. No undue stress

2. Some undue stress

Inappropriate stress was present that could have been practically avoided but would not likely affect an individual's examination performance.

3. Significant undue stress

Inappropriate stress was present that could have been practically avoided, and it would likely affect an individual's examination performance.

Examination Feedback

Ratings: Please use the rating scale described on the preceding page to indicate your judgment of the degree of undue stress that was present in each aspect of the examination identified below. Write the number (1, 2, or 3) in the space preceding the section.

Comments: Please comment about the source or cause of any undue stress, including who was affected (e.g., examinees, examiners) and suggested practical solutions. Attach additional sheets if necessary.

_____ Pre-examination Interactions with NRC

Comments: _____

_____ Written Examination: Administrative Controls/Procedural
Limits

Comments: _____ N/A _____

_____ Dynamic Simulator

Comments: _____

_____ Job Performance Measures

Comments: _____ N/A _____

Please comment on any practices which you believed were successful in reducing undue stress.

Your cooperation in completing this form is appreciated.