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NRC-91-0114



U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

2) NRC Examination Report 50-341/OL-91-01,
dated August 30, 1991

Subject: Response to NRC Examination Report OL-91-01 Concerns

This letter is in response to concerns expressed with examination material quality, examination security, examination administration, and the requalification training program resources, in Reference 2, for the August 5 through August 9, 1991 Fermi 2 licensed operator requalification examination.

Detroit Edison believes that the Fermi 2 operators are well trained and qualified to perform their duties. As noted in Reference 2, the licensed operator requalification program is satisfactory to assure that continued proficiency is maintained for licensed personnel. Nevertheless, the significance of the comments and concerns expressed in the examination report and their impact on future examinations is appreciated.

Aggressive actions have already been initiated that Detroit Edison believes are responsive to these concerns and significantly strengthen this important program. Attached is a re-statement of the concerns addressed in Reference 2 and a description of actions Detroit Edison has taken or will be taking to improve the licensed operator requalification program in these areas. The majority of this plan was discussed in a meeting on October 4, 1991 with NRC Region III staff.

Should you have any questions regarding this response, please contact James M. Joy, Senior Compliance Engineer, at (313) 586-1617.

Sincerely,

Handwritten signature of Stanley G. Catola.

cc: A. B. Davis
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RESPONSE TO NRC EXAM REPORT OL-91-01 CONCERNS

NRC Examination Report 50/341/OL-91-01 Concerns Regarding Examination Security

"During the NRC exam administration week of August 5-9, 1991, several situations occurred which had the potential for inadvertent exam compromise. On August 6, during the simulator scenario exams, control room logs from a previous crew were mistakenly left in the simulator when the next crew was brought in. The new crew noticed the written logs and immediately handed it to the simulator operator. During simulator JPMs [Job Performance Measures] on August 8, a loss of examinee control occurred twice. First, one group of JPM operators (two individuals) was left alone in a classroom while the next room contained another group who had not seen any of the simulator JPMs and was waiting to start the exam. Second, a facility evaluator allowed individuals who had completed the JPMs in the morning, to leave without ensuring that all individuals scheduled for the exam in the afternoon were being monitored. In both situations the NRC Chief Examiner monitored the groups and ensured that no compromise occurred and immediately instructed the facility to take action to properly monitor all groups."

Detroit Edison Response

Detroit Edison is confident that Fermi 2 licensed operators adhere to the highest standards of integrity and trustworthiness. Nevertheless, the following measures will be taken to strengthen examination security and prevent inadvertent compromise:

- A. Briefing notes will be prepared for briefing of examiners and examinees on "equalization exam security requirements.
- B. Direct observation of examinees, who have been exposed to exam materials, will be practiced to ensure that there is no contact between examinee teams during exam periods.
- C. Examinees exposed to exam material will be required to remain under direct observation until new examinees arrive for testing.

The above measures will be in place during the next NRC requalification examination, currently scheduled for December 1991.

NRC Examination Report 50-341/OL-91-01 Concerns Regarding Operator
Requalification Training Resources:

"It was brought to the NRC's attention that there are presently two requalification instructors. This limited number of requal instructors may find it an overwhelming burden to continue conducting routine scheduled requalification training/annual evaluation, material enhancement, and preparation/administration for the next NRC administered requalification exam scheduled for December 1991. If this condition continues, there is a potential for the quality and effectiveness of the requalification training program at Fermi 2 to decline. Some evidence of this may already exist in the form of poor overall performance/administration during the current NRC requal exam when compared to the 1990 requal exam."

Detroit Edison Response:

Detroit Edison concurs with the NRC's observations. The following measures will increase resources associated with the Operator Requalification Program:

- A. Two experienced Fermi Senior Reactor Operator (SRO) Licensed individuals were recently transferred to the operator requalification instructor staff.
- B. Additional contract SRO-certified instructors (3 individuals) have been added to the operator requalification instructor staff for the remainder of 1991.
- C. Permanent instructor staff allocated to the simulator upgrade and other projects will return to replace the contracted instructors in early 1992.

In addition, the overall licensed operator training program was enhanced as follows:

- A. A senior management individual with a current SRO qualification was assigned as the Director, Nuclear Training.
- B. One individual, previously SRO licensed, and one individual with SRO certification were permanently assigned to the initial licensed operator training staff.
- C. Additional contract staff (4 individuals) have been added to strengthen the simulator scenario development process and initial licensed operator training staff.

NRC Examination Report 50-341/OL-91-01 Concerns Regarding Examination Administration:

"The facility did not fully comprehend all of its exam administration responsibilities. This resulted in some disorganization among the training staff. In addition to crew briefing problems, exam security problems, and evaluator performance problems previously noted (elsewhere in the report), a lack of attention to detail when setting up the simulator was observed. For example: on the first day of the simulator scenario exam, the facility simulator operator forgot to realign the circuit breaker flag indications corresponding to the equipment condition for the electrical distribution panel. This error was not corrected until questioned by the next crew in the simulator. Guidelines associated with exam administrative responsibilities are delineated in NUREG 1021."

Detroit Edison Response:

Detroit Edison is taking the following measures to strengthen examination administration:

- A. All instructors, evaluators, and management observers will be trained on evaluation standards contained in NUREG 1021, Operator Licensing Examiner Standards, that address exam administration.
- B. Examinees will be instructed on the methodology to follow during JPM evaluations. (This is in response to unconscious cuing done by an evaluator without examinee asking during a JPM evaluation.)

The above measures will be implemented prior to the next scheduled Fermi 2 operator requalification examination, currently scheduled for December 1991.

N7 Examination Report 50-341/OL-91-01 Concerns Regarding Examination
Material Quality:

"After reviewing the facilities examination material, it was apparent that some improvements had been made; specifically in the area of simulator scenario variety. However, added attention is still needed in all three areas of exam material" (Written Exam, JPM's and simulator scenarios). Specific examples of problems identified with examination materials during the August, 1991 requalification exam were noted in section 3 of the NRC examination report.

Detroit Edison Response:

The following measures will be taken to improve examination materials:

A. Written Examination

- o By December, 1992, the examination question bank will be updated to link questions and learning objectives. Question bank data will be enhanced to document the estimated time to answer questions based upon a review to determine if the answer required to be provided by the examinee is to be answered from recall or from a review of reference material.
- o All future requalification examination time validations will be documented and submitted with the exam submittal.
- o By July 31, 1992, the examination question bank will be updated per NUREG BR-0122, Examiner's Handbook for Developing Operator Licensing Written Examination, and NUREG 1021, section ES-602, to resolve problems with YES/NO question balance, distractors, point values of multiple choice questions, consistency with operating procedures, and cognitive level.

B. Simulator Scenarios

- o Evaluation scenarios used for future exams will be validated to ensure expected actions are elicited for operator critical tasks.
- o Simulator scenarios being reviewed, revised and validated for the new simulator model will incorporate the requirements of NUREG 1021, section ES-604, "Requalification Simulator Examinations". Scenarios utilized in future examinations will meet the requirements of ES-604. All simulator scenarios will meet the requirements of ES-604 by the December, 1992 scheduled operator requalification examination.

C. Job Performance Measures (JPMs)

By July 31, 1992, the following measures will be taken to improve JPMs and JPM exam questions:

- o JPMs will be revised to reference the associated job task analysis and incorporate complete and correct system response cues. The JPM bank will be reviewed to determine if additional items that are time critical need to be added.
- o JPM questions will be:
 - * Time validated.
 - * Designated as reference/no reference.
 - * Identified as pertaining to RO or SRO.
 - * Revised to eliminate multiple choice questions and expand cognitive level.

Prior to the next requalification exam, currently scheduled for December 1991, approximately 20 JPMs and associated questions will be revised as outlined above.