



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION V

1450 MARIA LANE, SUITE 210  
WALNUT CREEK, CALIFORNIA 94596

RSB

JUN 20 1984

Mr. David Fogarty  
Executive Vice President  
Southern California Edison Company  
2244 Walnut Grove  
Rosemead, California 91770

Dear Mr. Fogarty:

On April 23, May 15-18, and May 29, 1984, the NRC conducted a requalification program evaluation at the San Onofre Nuclear Generating Station, Units 2 and 3.

At the conclusion of this evaluation, partial preliminary findings were discussed with those members of your staff identified in the enclosed report. The evaluation was completed on June 5, 1984 following the receipt and review of your evaluations of your operators and the comparison of these evaluations to our own.

As discussed in NUREG 1021, Operator Licensing Examiner Standards, the overall evaluation of the program adequacy must fall into one of three categories: satisfactory, unsatisfactory, or "marginal," (that is, between a fully satisfactory and an unsatisfactory category). The criteria for this determination are summarized in the Enclosure and detailed in NUREG 1021, ES-601.

Twenty five percent of the operators examined failed to pass all NRC portions of the examinations. Based on this criteria, the requalification program at San Onofre is evaluated as marginal.

Several findings reinforced this determination. They were:

Most operators (6 of 9) failed the combined NRC-PGE written examinations.

Most licensed operators had not attended approximately 1/3 of the required requalification lectures in 1982 and 1983.

The 1983 and 1984 SCE examinations appear significantly simpler than a typical NRC examination due to their shorter length. The 1983 and the 1984 SCE examinations were less than 1/2 the length of a typical NRC exam (in terms of total responses required). In addition, the SRO exams prepared by SCE used the RO section areas for the examination. This method of organization emphasized the design and instrumentation areas at the expense of procedural knowledge.

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Mr. David Fogarty

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As required by NUREG 1021, performance on a second requalification program audit by the NRC in the marginal range automatically results in an unsatisfactory evaluation. To avoid this possibility, we believe increased management attention to this area is required. Please notify this office within ten working days of your commitment to the following program (or propose a similar program which will address the deficiencies identified):

All personnel with section grades < 70% or overall grades < 80% (based on the NRC grading for candidates who took the combined examination) should be temporarily relieved from licensed duties for accelerated retraining and reexamination.

SCE must ensure that all classroom refresher training is attended by all operators. Missed classes must be made up. An improved method to ensure this should be identified.

In accordance with 10 CFR 2.790(a), a copy of this letter and Enclosure 1, Examination Report, will be placed in the NRC Public Document Room unless you notify this office by telephone within 10 days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1). Enclosure 2 will be withheld from public disclosure in accordance with 10 CFR 9.5(a)(6).

Should you have any questions concerning this letter, please contact us.

Sincerely,  
*Original Signed by*  
John B. Martin  
John B. Martin  
Regional Administrator  
Region V

Enclosures:

1. Examination Report
2. Examination Grading Summaries

cc: H. B. Ray, SCE  
H. Mathis, SCE  
L. Miller, RV  
R. Pate, RV  
T. Bishop, RV

bcc: RSB/Document Control Desk (RIDS)

Distributed by RV:

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State of California  
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L. Miller:dh  
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J. Martin  
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