

Vepco

VIRGINIA ELECTRIC AND POWER COMPANY

Surry Power Station
P.O. Box 315
Surry, Virginia 23883

June 22, 1984

Mr. Timothy Norris
Operator Licensing Section
Division of Engineering and Operational Programs
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 2900
Atlanta, Georgia 30303

Dear Mr. Norris,

Following are additional comments pertaining to the review by members of the Surry Training staff of the RO and SRO NRC License exams administered to the Surry license candidates on June 18, 1984. The Attachment contains the item by item comments presented following the exam review with references listed where appropriate.

In general it appeared that the exam authors had attempted to make the exams operationally oriented. However, it is our opinion that there were too many questions on systems and topics of minor or no safety significance. More emphasis should be placed on those systems and related topics for which an inadequate knowledge could cause an adverse affect on the health and safety of the public.

Too much memorization was required of steps and setpoints in minor and insignificant Abnormal and Operating procedures. Once again, this emphasis should be placed on areas of greater safety significance.

As we continued through the review it became increasingly obvious that some of the problems we encountered would have been avoided had our system descriptions been more adequate. However, even the finest system descriptions will not prevent the improper balance of emphasis between topics of safety significance and those of minor operational importance.

After working and talking with you and your team of examiners this week we feel confident that the NRC examination process is becoming more valid and that the effort to make the exams more objective and performance based is well underway.

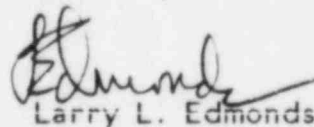
We do have some concerns pertaining to the review process. We feel that it is very important that the written exam review be conducted prior to/during administration of the exam. This allows opportunity for changes/corrections to questions which are deemed inappropriate and particularly those which are technically incorrect before the candidates complete the exam.

We realize that this whole process is in the public eye and that some might perceive the pre-exam review as a possible compromise of exam integrity but the psychological effect on the candidates of having to cope with inappropriate or technically wrong questions must be considered. We would recommend that the review be conducted and appropriate changes made prior to administering of the written exam. This would require that the lead examiner have the authority to make changes. The process would be as follows: The NRC exam team and the exam reviewers from the utility would meet early the morning of the exam (i.e. 6:00am). Once the exam process began utility exam reviewers would not be allowed to leave the review room unless accompanied by a member of the NRC exam team. The exams would be reviewed and corrections made as appropriate. Questions which could not be resolved between utility personnel and the NRC lead examiner would be submitted for further review and consideration through appropriate channels as they are now with the current review process.

Candidates would be instructed not to report to work until such time as the review process is complete (i.e. 10:00am). To prevent any contact between exam reviewers and candidates, the reviewers would be required to remain in the review room until all candidates had reported to the exam room and been accounted for by NRC exam team members.

Thank you very much for your consideration in these matters.

Sincerely,



Larry L. Edmonds

LLE/ltb

cc: Station Manager
Director - Nuclear Training