In Reply Refer To: Dockets: 50-445/OL-88-01

TU Electric
ATTN: Mr. W. G. Counsil
Executive Vice President
400 North Olive, L.B. 81
Dallas, Texas 75201

Gentlemen:

SUBJECT: OPERATOR LICENSING EXAMINATIONS AT COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

In a telephone conversation between Messrs. Michael A. Niemeyer, Operations Training Supervisor and John E. Whittemore, Examiner, arrangements were made for the administration of reactor operator and senior reactor license examinations at the Comanche Peak Facility during the weeks of June 6 and June 13, 1988.

In order for NRC to meet the above schedule, it will be necessary for facility management to furnish the approved reference material listed in Enclosure 1, "Reference Material Requirements for Reactor/Senior Reactor Operator Licensing Examinations," to the extent it is available at your facility, by April 25, 1988. Any delay in receiving properly bound and indexed reference material may result in a delay in administering the examinations. Examinations are scheduled far in advance with considerable planning to utilize limited examiner manpower and to meet the examination dates requested by the various facility licensees. Therefore, missing the April 25, 1988, deadline, even by a few days, may result in a long delay because it may not be possible to reschedule examinations for other facility licensees. Mr. Niemeyer has been advised of our reference material requirements.

The facility management is responsible for providing adequate space and accommodations in order to properly conduct the written examinations. Enclosure 2, "Administration of Reactor/Senior Reactor Operator Licensing Written Examinations," describes NRC requirements for conducting these examinations. Mr. Niemeyer has also been informed of these requirements.

Enclosure 2, also contains the Rules and Guidance that will be in effect during the administration of the written examination. The facility management is responsible for ensuring that all candidates are aware of these rules.

RE JWhittemore:cs 3//8/88 C:OLS and JPellet 3/18/88 # JAN Thoan 3/ 8/88 D:DRP 2 LCallan 3/18/88

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The facility staff review of the written examination will be conducted in accordance with the specifications in Enclosure 3, "Requirements for Facility Review of Written Examination." Mr. Niemeyer has been informed of these requirements.

Reactor operator and senior reactor operator license applications for all candidates should be submitted at least 60 days before the first scheduled examination date so that the NRC will be able to review the training and experience of the candidates, process medical certifications, and issue examiner assignments. If copies of the applications are not received at least 30 days before the examination date, it is likely that a postponement will be necessary. All training and qualification requirements must be met by each candidate prior to application submittal.

Until December 31, 1988, in order to allow you to modify your training program so that all training is completed prior to submission of an application, you are permitted to request an exemption of this certification requirement. This can be done by lining through the language in Item 19.b on the application, NRC Form 398, concerning completion of licensee requirements and by referencing a separate attachment to the application containing the following language:

The applicant has not yet successfully completed the licensee requirements to be licensed as an Operator/Senior Operator. However, he/she will have completed them prior to the examination. Upon completion of the requirements, a certification to that effect will be provided as a further addendum to this application. In the interim, it is requested, pursuant to 10 CFR 55.11, that the applicant be exempted from this requirement, as contained in 10 CFR 55.31(a)(4).

Printed Name and Signature-Training Coordinator

Printed Name and Signature-Senior Management Representative on Site

Once the applicant completes the training requirements an addendum to NRC Form 398 would be required to be sent. This addendum must be received prior to the examination date. The format and content of this addendum should read as follows:

Addendum to NRC Form 398

Application	of	
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Facility Name

Printed Name and Signature-Training Coordinator

Printed Name and Signature-Senior Management Representative on Site

This is to certify that has successfully completed the licensee requirement for licensing, as required under 10 CFR 55.31(a)(4).

This request for information was approved by the Office of Management and Budget under Clearance No. 3150-0101, which expires May 31, 1989. Comments on burden and duplication may be directed to the Office of Management and Budget, Reports Management Room 3208, New Executive Office Building, Washington, DC 20503.

Thank you for your consideration in this matter. If you have any questions regarding the examination procedures and requirements, please contact Messrs. John E. Whittemore, Examiner at (817)860-8294 or John L. Pellet, Chiet, Operator Licensing Section, at (817)860-8159.

Sincerely,

L. J. Callan, Director Division of Reactor Projects

Enclosures:

1. Reference Material Requirements

2. Written Exam Administration Requirements

3. Facility Review Requirements

cc w/enclosures:

TU Electric

ATTN: Roger D. Walker

Manager, Nuclear Licensing

Skyway Tower

400 North Olive Street, L.B. 81

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(cc cont'd next page)

Bureau of Radiation Control State of Texas 1100 West 49th Street Austin, TX 78756 cc cont'd: Juanita Ellis President - CASE 1426 South Polk Street Dallas, TX 75224

Renea Hicks, Esq.
Assistant Attorney General
Environmental Protection Division
P.O. Box 12548, Capitol Station
Austin, TX 78711-2548

U.S. Nuclear Regulatory Commission ATTN: Peter Bloch Administrative Judge Washington, D.C. 20555

Oak Ridge National Laboratory ATTN: Elizabeth B. Johnson Administrative Judge P.O. Box X, Building 3500 Oak Ridge, TN 37830

Dr. Kenneth A. McCollom 1107 West Knapp Administrative Judge Stillwater, OK 74075

Dr. Walter H. Jordan Administrative Judge 881 West Outer Drive Oak Ridge, TN 37830

Anthony Z. Roisman, Esq. Suite 600 1401 New York Avenue, N.W. Washington, D.C. 20005

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ATTN: Homer C. Schmidt
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ATTN: Robert E. Ballard, Jr.
Director of Projects
11 Penn Plaza
New York, NY 10001

Westinghouse Electric Corporation ATTN: R. S. Howard P.O. Box 355 Pittsburgh, PA 15230

Christic Institute ATTN: Lanny A. Sinkin 1324 N. Capitol Street Washington, D.C. 20002 cc cont'd:
Billie Pirner Barde, Esq.
Government Accountability Project
Midwest Office
104 East Wisconsin Avenue
Appleton, WI 54911

Spiegel & McDiarmid ATTN: Robert Jablon Bonnie S. Blair 1350 New York Avenue, N.W. Washington, D.C. 20005-4798

Senior Citizens Alliance of Tarrant County, Inc. ATTN: George A. Parker, Chairman Public Utility Committee 6048 Wonder Drive Fort Worth, TX 76133

TU Electric ATTN: Jack Redding c/o Bethesda Licensing 3 Metro Center, Suite 610 Bethesda, MD 20814

Comanche Peak Steam Electric Station ATTN: M. A. Niemeyer, Operations Training Supervisor P.O. Box 2300 Glen Rose, TX 76043

bcc to DMB (IE42)

bcc dist. by RIV: Local PDR RIV Files CPPD:OSP Reading (Mail Stop 7-H-17) Site Reading CPPD Reading (HQ) SRI-CONST SRI-OPS OSP (Mail Stop 7-D-24) MIS System, RIV RSTS Operator DRP J. Tayior L. Shea, RM/ALF C. Grimes S. Ebneter/JAxelrad J. Lyons P. McKee M. Malloy J. Wilson

Orrick, Herrington & Sutcliffe ATTN: David R. Pigott, Esq. 600 Montgomery Street San Francisco, CA 94111

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ENCLOSURE 1

REFERENCE MATERIAL REQUIREMENTS FOR REACTOR/SENIOR REACTOR OPERATOR LICENSING EXAMINATIONS

 Existing learning objectives and lesson plans (including training manuals, plant orientation manual, system descriptions, reactor theory, thermodynamics, etc.).

Training materials should include all substantive written material used for preparing candidates for initial RO and SRO licensing. The written material should be inclusive of learning objectives and the details presented during lecture, rather than outlines. Training materials should be identified by plant and unit, bound, and indexed. Failure to provide complete, properly bound and indexed reference material will result in canceling and rescheduling of the examinations. Training materials which include the following should be provided:

- o System descriptions including descriptions of all operationally relevant flow paths, components, controls, and instrumentation. System training material should draw parallels to the actual procedures used for operating the applicable system.
- o Complete and operationally useful descriptions of all safety-system interactions, and, where available, BOP system interactions under emergency and abnormal conditions, including consequences of anticipated operator error, maintenance error, and equipment failure.
- Training material used to clarify and strengthen understanding of emergency operating procedures.
- Comprehensive theory material that includes fundamentals in the area of theory of reactor operation, thermodynamics, heat transfer and fluid flow, as well as specific applications to actual in-plant components. For example, mechanical theory material should include pump theory as well as descriptions of how these principles actually apply to major plant pumps and the system in which they are installed (i.e., reactor coolant pumps, all ECCS pumps, recirculation pumps, feedwater and emergency feedwater pumps). Reactor theory material should include descriptions that draw explicit ties between the fundamental and actual operating limits followed in the plant (e.g., reactor theory material should contain explanations how principles relate to the actual curves used by operators to verify shutdown margin or calculate an ECP).
- Procedure Index (alphabetical by subject).

- All administrative procedures (as applicable to reactor operation or safety).
- 4. All integrated plant procedures (normal or general operating procedures).
- 5. Emergency procedures (emergency instructions, abnormal or special procedures).
- 6. Standing orders (important orders that are safety-related and may supersede the regular procedures).
- 7. Fuel handling and core loading procedures, (initial core loading procedure, when appropriate).
- 8. Radiation protection manual (radiation protection manual or procedures).
- 9. Emergency plan implementing procedures.
- 10. Technical Specifications.
- 11. System operating procedures.
- 12. Piping and instrumentation diagrams, electrical single-line diagrams, or flow diagrams.
- Technical data book, and/or plant curve information as used by operators and facility precautions, limitations, and set points (PLS) for the facility.
- 14. Questions and answers that the facility licensee has prepared (voluntary by facility licensee).
- 15. The following on the plant reference simulation facility:
 - a. List of all readily available initialization points.
 - b. List of all preset malfunctions with a clear identification number. The list should include cause and effect information. Specifically, for each malfunction a concise description of the expected result, or range of results, that will occur on implementation should be provided. Additionally, an indication of which annunciators are to be initially expected should be given.
 - c. A description of simulator failure capabilities for valves, breakers, indicators, and alarms.
 - d. Where the capability exists, an explanation of the ability to vary the severity of a particular malfunction should be provided, i.e.,

the ability to vary the size of a given LOCA or steam leak, or the ability to cause a slow failure of a component such as a feed pump, turbine generator, or major valve (e.g., drifting shut of a main feedwater control valve).

- e. An indication of modeling conditions or problems that may impact the examination.
- f. Identification of unknown Performance Test Failures not yet completed.
- g. Identification of significant differences between the simulator and the control room.
- h. Copies of facility licensee-generated scenarios that expose the candidates to situations of degraded pressure control (PWR), degraded heat removal capability (PWR and BWR), and containment challenges (BWR) may be provided (voluntary by facility licensee).
- i. Simulator instructors manual (voluntary by facility licensee).
- j. Description of the scenarios used for the training class (voluntary by facility licensee).
- 16. Additional material required by the examiners to develop examinations that meet the requirements of these standards and regulations.

The above reference material should be approved, final issues, and so marked. If a plant has not finalized some of the material, the chief examiner is responsible for ensuring that the most complete, up-to-date material is available and that agreement has been reached with the facility licensee for limiting changes before the administration of the examination. All procedures and reference material should be bound or IN THE FORM USED BY THE CONTROL ROOM OPERATORS, WITH appropriate INDEXES or TABLES OF CONTENTS so that they can be used efficiently.

ENCLOSURE 2

REQUIREMENTS FOR ADMINISTRATION OF WRITTEN EXAMINATIONS

- 1. A single room shall be provided for completing the written examination. The location of this room and supporting rest room facilities shall be such as to prevent contact with all other facility licensee and/or contractor personnel during the duration of the written examination. If necessary, the facility licensee should make arrangements for use of a suitable room at a local school, motel, or other building. Obtaining this room is the responsibility of the facility licensee.
- 2. Minimum spacing is required to ensure examination integrity as determined by the chief examiner. Minimum spacing should be one candidate per table, with a 3-foot space between tables. No wall charts, models, and/or other training materials shall be present in the examination room.
- 3. Suitable arrangements shall be made by the facility licensee if the candidates are to have lunch, coffee, or other refreshments. These arrangements shall comply with Item 1 above. These arrangements shall be reviewed by the chief examiner and/or proctor.
- 4. The facility licensee shall provide pads of 8-1/2 by 11-in. lined paper in unopened packages for each candidate's use in completing the examination. The examiner shall distribute these pads to the candidates. The facility licensee shall provide unmarked steam tables for candidate use as requested by the chief examiner. When requested by the chief examiner, the facility licensee shall also prepare copies of large documents (i.e., Technical Specifications, Emergency Plan Implementing Procedures, Emergency Operating Procedures, etc.) for use by the candidates. Such requests will normally be made known to the facility licensee the working day prior to the written examination. All other reference material needed to complete the examination shall be furnished by the examiner. Candidates may bring pens, pencils, nonprogramable calculators, or slide rules into the examination room. No other equipment or reference material shall be allowed.
- 5. Only black ink or dark pencils should be used for writing answers to questions.

ENCLOSURE 3 REQUIREMENTS FOR FACILITY REVIEW OF WRITTEN EXAMINATIONS hall be no review of the written examination by the faci e staff before or during the administration of the examin

- There shall be no review of the written examination by the facility licensee staff before or during the administration of the examination. Following the administration of the written examination, the facility licensee staff shall be provided a marked-up copy of the examination and the answer key.
- 2. The facility licensee will have five (5) working days from the day the written examination is given to submit formal comments. The formal comments will be approved by the highest level of corporate management for plant operations, e.g., Vice President for Nuclear Operations, and submitted to the Region IV office with a copy to the Section Chief for Operator Licensing. Comments not submitted within five (5) working days will be incorporated into the grading process on a case by case basis as determined by the Section Chief. No grading will be done until the formal comments are received and resolved. If the formal comments are not received by the deadline the final examination results may be delayed several weeks since the grading may have to be rescheduled in a later time slot.
- 3. The following information shall be provided for each individual comment:
 - a. NRC question number
 - b. Facility licensee comment
 - c. Copy of supporting documentation (the reference may be cited if the document is held by the Operator Licensing Section)

NOTES:

- 1. No change to the examination will be made without submittai of, or proper reference to, complete, current, and approved reference material.
- Comments made without a clear, concise, facility licensee recommendation, will not be addressed.