APPENDIX B

U.S. NUCLEAR REGULATORY COMMISSION REGION IV

NRC Inspection Report: 50-482/88-21 Operating License: NPF-42

Docket: 50-482

Licensee: Wolf Creek Nuclear Operating Corporation (WCNOC)

Facility Name: Wolf Creek Generating Station (WCGS)

Inspection At: WCGS, Coffey County, Burlington, Kansas

Inspection Conducted: July 11-15, 1988

Inspectors:

D. R. Hunter, Senior Reactor Inspector Operational Programs Section, Division of Reactor Safety

G. A. Prok Reactor Inspector, Operational Programs Section, Division of Reactor

Safety

Approved:

Gagliardo, Chief, Operational Programs

Section, Division of Reactor Safety

Inspection Summary

Inspection Conducted July 11-15, 1988 (Report 50-482/88-21)

Areas Inspected: Routine, unannounced inspection of the nonlicensed staff training program, licensed operator training program and related followup items.

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Results: Within the three areas inspected, two violations were identified (failure to follow procedures, paragraph 2, and failure to implement adequate corrective action, paragraph 4).

PETAILS

Persons Contacted

WCNOC

*B. D. Withers, President *F. T. Rhodes, Vice President, Nuclear Operations

*G. D. Boyer, Plant Manager

+*C. E. Parry, Manager, Quality Assurance (OA)

J. Zell, Manager, Nuclear Training

+*O. L. Maynard, Manager, Licensing *C. N. Fowler, Manager, Instrumentation and Control (I&C) +*C. M. Estes, Manager, Operations

*J. L. Houghton, Operations Supervisor

*A. A. Freitag, Manager, Nuclear Plant Engineering R. W. Holloway, Manager, Maintenance and Modifications

*B. McKinney, Manager, Technical Support

+ D. Fehr, Superintendent, Licensed Operator Training

*C. G. Patrick, Supervisor, Quality Systems *R. S. Benedict, Manager, Plant Inspection *R. D. Flannigan, Superintendent, Compliance *P. C. Rayse, Quality Training Coordinator

+*J. E. Gilmore, Supervisor, Licensed Operator Training

*C. T. Hoch, QA Technician

+*H. K. Chernoff, Licensing Engineer

*W. L. Railey, Maintenance Training Coordinator

*R. L. Buffum, Electrical Program Training Coordinator

*M. L. Hitch, QA Clerk

J. McMahon, Supervisor, Technical Training

C. Weedthe, Quality Control (QC) Training Coordinator

G. Smith. Coordinator, Licensed Operator Requalification Training

NRC

*B. L. Bartlett, Senior Resident Inspector

+ M. E. Skow, Resident Inspector

+ L. J. Callan, Director, Division of Reactor Projects

+ D. D. Chamberlain, Chief, Project Section A

*Attended exit meeting on July 15, 1988.

+ Participated in telephone exit briefing on July 22, 1988.

Followup on Previously Identified Inspection Findings 2.

(Closed) Unresolved Item (482/8719-01): Failure to Obtain Commission Approval Prior to Decreasing Scope of Requalification Program - Procedure ADM 06-224, Pevision 5, "Licensed Operator Requalification Training Program," allowed a 1 month grace period in which onshift licensed personnel could make up any missed watchstanding shifts.

effectively allowed onshift licensed individuals 4 months to meet their onshift requirements. These requirements involved standing a minimum of seven 8-hour or five 12-hour shifts in a calendar quarter. The implementation of the requirement to allow 4 months to complete onshift watchstanding hours was untrary to Section 50.54(i-1) of 10 CFR Part 50. Section 50.54(i-1) states, in part, that the licensee may not, except as specifically authorized by the Commission, decrease the scope of the operator requalification program.

During this inspection, the NRC inspector verified through review of Procedure ADM 06-224, Revision 7, "Lice sed Operator Requalification Training Program," that the procedure was corrected and agrees with the Commission approved requalification program. This item is considered closed.

(Closed) Open Item (482/8719-02): Romoval of Individuals From Licensed Duties - As identified in NRC Inspection Report 50-482/87-19, Ticensee management policy allowed an individual, who had scored less than 80 percent overall on the requalification examination, to continue performing licensed duties until there existed a convenient time for removal from shift duties. The NRC inspectors informed the licensee that the intent of the accelerated requalification program portion of 10 CFR Part 55 was to ensure that individuals, identified as needing additional training, were promptly removed from licensed duties.

During this inspection, the NRC inspector reviewed Procedure ADM 06-224, Revision 7. "Licensed Operator Requalification Training Program," Section 6.5.2, which covered the accelerated requalification program. Procedure ADM 06-224, Revision 7, Step 6.5.2.1 allowed two working days to remove a licensed individual from onshift duties and place him/her in an accelerated requalification program. This procedure did not agree with the requirements specified in the licensea's documented licensed operator accelerated requalification program described in USAR Section 13,2,1,2,9, Section 13.2.1.2.9 states, in part, "Licensed individuals who are in the accelerated requalification training program because of examination results are relieved of all licensed duties." These provisions of Procedure ADM 06-224, which would allow an individual to remain onshift for up to two days following his/her notification and entry into the accelerated requalification program, appear to deviate commitments of the USAR as cited above. The licensee has formally notified the NRC that a systematic approach to training has, however, been implemented. This superseded the USAR sections on requalification training. During subsequent discussion, the licensee committed to revise Procedure ADM 06-224 to require immediate removal from licensed duties of operators who fail a requalification examination. The open item regarding the removal of individuals from licensed duties is considered closed; however, pending NRC review of the revised Procedure ADM 06-224, and the updated USAR section on requalification training, this is considered an open item (482/8821-01).

The NRC inspector reviewed the accelerated requalification training records for the two individuals who had failed their 1987 requalification examination. The following items were reviewed: the initial requali-fication examination; the memoranda that informed the individuals that they were to be removed from onshift licensed duties, including the reason for the removal and the remedial training scheduled for them; and, the memoranda which listed the training schedules and the retake examina-tion dute. During review of the documentation, the inspector noted that 8 days had clapsed between formal notification to one operator and the beginning of the training. From review of control room logs, the NRC inspector determined that the affected individual had functioned as a watchstander for six watches during the period of August 11-16, 1987. The individual had been notified on August 11, 1987, that remedial training would be necessary. Procedure ADM 06-224, Revision 5, "Licensed Operator Requalification Training Program," Step 6.5.2.5.2, dated June 19, 1987 (the revision in effect at the time of the occurrence) stated that: "An individual enrolled in an accelerated requalification program shall be removed from all licensed duties until he has successfully completed the accelerated requalification program." WCGS Technical Specifications (TS) 6.8.1 requires, that, "Written procedures shall be established, implemented, and maintained covering . . . a. The applicable procedures recommended in Appendix A of RG 1.33, Revision 2, February 1978." Procedure ADM 06-224 supplements this requirement. Appendix A of Regulatory Guide (RG) 1.33, requires that safety-related activities carried out during the operations phase should be covered by written procedures. The licensee's failure to remove the subject individual from all licensed duties following his failure of the annual requalification examination is an apparent violation (482/8821-02).

(Closed) Open Item (482/8719-03): Failure to Implement 10 CFR 55 Rule Change Notification Requirements - During a previous inspection, an NRC inspector determined that the licensee did not have a procedure to implement the new notification requirements for a change in licensed operator status established on May 27, 1987. Section 55.53(g) of 10 CFR Part 55 and Section 50.74 of 10 CFR Part 50 established the new reporting requirements for licensed operator status changes. The NRC inspector verified that Procedure ADM 01-033, Revision 16, "Instructions Describing Reportability, Review and Documentation of Licensee Event Reports (LERs) and Defect Deficiencies," Sections 5.5 and 4.9 dated October 27, 1987, contained the necessary guidance to implement the new requirements for notification to the NRC. This item is considered closed.

(Closed) Violation (482/8632-01): Failure of Post-Test Review to Identify an Out-of-Specification Value and Institute Proper Corrective Action - As identified in NRC Inspection Report 50-482/86-32, during the post-test review of STS MT-019, dated October 19, 1985, the reviewers failed to identify and take appropriate corrective action. The reviewers did not restore the "as-listed" out-of-specification value of the average specific gravity to within the limits in accordance with Procedure ADM 02-300, "Surveillance Testing," Step 5.6.2.

During this inspection, the NRC inspector verified that the Supplemental Correction Report corrected the errors discussed previously. The NRC inspector verified that the licensee conducted training on this issue. Attendance sheets documented the required reading of this violation and the licensee's response to the violation. The licensee had also implemented "Desk Top Instructions." These instructions required the data to be verified and double checked. This item is considered closed.

(Closed) Unresolved Item (482/8718-01): Verification of Fire Watch for Fire Dampers - As discussed in NRC Inspection Report 50-482/87-18, the licensee had not considered 20 fire dampers as inoperable during the performance of modification activities (PMR 02009).

The licensee stated that it was a conscious decision not to retest the dampers since testing of the dampers before the modification had demonstrated them to be operable. As identified during the previous NRC inspection, the NRC inspector determined that the dampers were modified to such an extent that they should have been declared inoperable and retested.

Document review and interviews revealed that Work Requests 70143-87 and 70144-87 were issued on April 13, 1987, to conduct post-modification operability testing of the modified dampers in accordance with the WCS TS surveillance tests, STS MT-036 and STS MT-037.

The inspector verified through document review that the modification activities associated with the fire dampers, including the post-modification testing, was completed on October 13, 1987, returning the fire dampers to the fully operable condition.

The RRC inspector determined that a fire watch had been established on April 6, 1987, Fire Impairment Permit 87-132 and 87-133. The fire watch continued through December 27 (87-132) and 28 (87-133) for the power blocks due to the discovery of degraded fire penetration seals. The provision of a fire watch for the penetration seals provided some level of protection for the fire dampers, which reduced the safety significance of the licensee oversight.

The NRC inspector determined that the fire dampers should have been declared inoperable although the licensee argued that the fire dampers were operable based on previously completed testing (i.e., the modification activities did not affect the operability of the dampers). A fire impairment permit should have been issued in accordance with Administrative Procedure ADM 13-103, Revision 3, Step 4.1., "Fire Protection: Impairment Control," which required the establishment of a fire watch as a result of the impairment.

The licensee's failure to issue a "Fire Impairment Request" in accordance with the requirements of Procedure ADM 13-103, establishing the required fire watch during the damper modification activities, is another example of the apparent violation of TS 6.8.1 (482/8821-02).

This unresolved item is considered closed.

No other violations or deviations were identified in the review of this inspection area.

Nonlicensed Staff Training (41400)

Selected portions of the nonlicensed staff training program were reviewed to verify implementation of TS 6.3, Unit Staff Qualifications; ANSI/ANS 3.1-1978, Selection and Training for Nuclear Power Plant Personnel; USAR Section 17.2.2.7, Personnel Training and Qualification; and USAR Section 13.2.2, Nonlicensed Plant Staff Training. Selected procedures and documents were reviewed, as identified in Attachment 1, and selected personnel were interviewed.

The licensee received accreditation of their remaining required training programs from INPO in early 1988. All the applicable licensee training programs have now been accredited by INPO.

The required reading programs were reviewed and interviews conducted in the maintenance and I&C areas. Each group (e.g., maintenance, HP, chemistry, operations) conducted and controlled their own required reading program. The program was used extensively to keep plant personnel up to date with plant and industry matters. The requirements did not appear to be uniform or consistent within the groups and could be improved to provide more detailed guidance for handling required reading. This matter was discussed with the licensee for consideration and is an open item (482/8821-03) pending further review of the overall controls and implementation of the required reading program. In the areas reviewed, it appeared that the licensee's program for nonlicensed staff personnel training met commitments and requirements.

No violations or deviations were identified in the review of this inspection area.

Licensed Operator Training (41701)

The NRC inspector reviewed, in part, the licensed operator requalification training program to determine the effectiveness of the training being presented.

The NRC inspector selected the licensee event reports (LERs) listed in Attachment 2 to determine the training provided. The training provided before the event, if any, was reviewed to determine if it could have prevented and/or mitigated the consequences of the event. If any training was provided after the event, it was also reviewed to evaluate the effectiveness of the training presented to prevent recurrence of the event.

The NRC inspector determined from discussions with the licensee that generally formal classroom training before the events consisted of systems

training received during the initial operator license training program. Control manipulations and attention to the control panels had been practiced during routine simulator exercises.

Training presented after the events occurred consisted of placing the LER in required reading for six of the LERs and counseling the licensed individuals involved. The NRC inspector confirmed, through review of required reading attendance sheets, that the LERs were placed in required reading as stated in the LER. The NRC inspector determined that two of the events had been discussed in "Plant/Industry Events" presented in licensee requalification cycle three and one event was discussed in licensee requalification cycle five. For two of the events the inspector found that no training was conducted after the event. This appeared to be ineffective corrective action. This can be demonstrated with the following example:

LERS 482/85-019, 482/86-008, and 482/87-018 were issued to report the same type of event. Each event occurred when a licensed operator placed the Auxiliary Feedwater Actuation Signal (AFAS) block switch in the "Permit" position. Since both main feedwater pumps were secured an AFAS and Steam Generator Blowdown and Sample Isolation Signal (SGBSIS) were initiated. Corrective action, for all of these instances included counseling the licensed operator onshift at the time and placing the LER in the operations required reading. Additionally, after the two initial occurrences, the control procedure step sequence was altered. The root cause of the problem was not identified and thus action to prevent recurrence was not taken.

The NRC inspector determined that the training corrective actions being implemented appeared to be ineffective for preventing recurrence. Procedure KGP-1210, Revision 1, "Corrective Attion," Step 7.1.10 requires, in part, that the appropriate division manager shall specify the corrective actions necessary to prevent recurrences of the deficiency. Procedure OAP 16.1, Revision 1, "Corrective Action for QA Program Breakdowns." Section 6.0 requires, in part, that corrective action control as established in this procedure shall assure that significant conditions adverse to quality are promptly corrected to preclude recurrence in occordance with KGP-1210. Procedure QAP 16.1, also provides criteria for determining if a condition constitutes a significant condition adverse to quality. Criterion XVI of Appendix B to 10 CFR 50 requires, in part, that measures shall be established to assure that the cause of significant conditions adverse to quality be determined and that corrective action be taken to preclude repetition. The failure to implement effective correction to prevent recurrence of the above LERs is an apparent violation (482/8821-04).

The inspector also found that LER 482/87-57 identified four previous occurrences of an administrative failure to establish the appropriate fire watch. The corrective action involved training the licensed individuals through required reading. As reported in the LER, the licensee

acknowledged after this fifth similar occurrence that the previous corrective actions were not effective and required enhancement.

The NRC inspector reviewed the required reading program described in Procedure ADM 02-103, Revision 8, "Required Reading." Required reading attendance sheets for the period July 1987 through April 1988 were reviewed. The required reading reviews were completed within the prescribed time limits, with the exception of one operations crew, which was late in returning their sign-off sheets during March and April 1988. The NRC inspector determined that the crew with the delinquent attendance sheets were candidates in the hot license class. The NRC inspector learned from discussions with licensee representatives that the candidates will be required to review all of the missed required reading after taking and/or passing the NRC License Examination but before assuming licensed duties.

The operations manager was required to certify his review/approval of information to be placed in required reading. This involved nothing more than signing his name after the title listed on the information cover page. If the information was considered important enough to be read immediately before going on shift, it was to be marked "essential." The required reading process appeared to be satisfactory, but one weakness existed in the material covered. Since required reading was utilized to implement corrective action, which involved training, it needed to be better controlled by licensee management. The required reading cover sheet did not specify what licensee management expected the licensed operators to learn from the material, when it was used as a training corrective measure. To be more effective, consideration should be given to placing common controls/requirements over the various discipline required reading programs. This is a second example of an open item (482/8821-03).

The NRC inspector reviewed the following lesson plans related to "Plant/Industry Events":

Lesson Plan Number

LR 10 108 03

LR 10 108 04

LR 10 108 05

LR 10 108 06

LR 10 108 07

LR 10 108 08

All lesson plans appeared to be technically sound.

The results of the last three annual requalification examinations and initial examinations are summarized in Attachment 3.

The 1988 requalification training hours were divided as follows:

Simulator	48
Classroom	165
Self-Study	37
Evaluation/Exam	12
Total	262

This resulted in the following breakdown of a licensed operators time in training: 18 percent simulator, 63 percent classroom, 14 percent self-study, and 5 percent evaluation.

The following area reviewed by the NRC inspector appeared to indicate a weakness in the licensee's program for use of procedures.

Procedure ADM 02-021, Revision 10, "Use of Procedures in Operations," established guidance for the use of Operations Procedures. The procedure required, in part, that an individual verify that the procedure being utilized is the current revision. Additionally, the NRC inspector determined from discussions with licensee representatives that company policy required the users to familiarize themselves with a procedure before using it. This relied upon the operators knowledge and abilities without providing any guidance.

The following examples indicated possible areas where more familiarity was needed in procedure usage: When training on a new system design, the training department did not always have the procedures available in time to provide the required training; as described previously from the required reading sample reviewed, operations required reading covered items selected by the operations manager without the necessary management guidance.

Based on the above, there appeared to exist the possibility for a licensed individual to be required to use a procedure which had never been seen before. Additionally, if the step sequence of a procedure, which described how to operate a system/component were changed, there appeared to be no formal mechanism to assure that the licensed operators were notified of these changes.

The NRC inspector determined from review of licensee procedures and interviews with licensee representatives that no formalized mechanism existed to request needed and/or desired training. Generally, training requests were made to the training department through a telephone conversation. This method did not provide sufficient controls and/or checks to ensure that the training would be implemented. Additionally, this method did not allow for documentation of training completed as requested nor did it provide any "ay to document the reason why the training could not be implemented.

The license: formally implemented a systematic approach to training on August 26, 1987, by sending a letter to NRR stating that the licensed

operator programs had been accredited and that the programs were based on a systems approach to training.

No other violations or deviations were identified in the review of this inspection area.

5. Exit Interview

The inspection scope and findings were summarized with those individuals identified in paragraph 1. The licensee did not identify as proprietary anything provided to nor reviewed by the inspectors.

During a telephone conversation on July 22, 1988, the inspectors summarized the changes in the inspection findings with those individuals identified in paragraph 1.

ATTACHMENT 1

The following documents were utilized:

- ADM 01-005, Revision 3, Superintendent of Maintenance Duties and Responsibilities
- ADM 01-012, Revision 2, I&C Supervisor Duties and Responsibilities
- ADM 01-014, Revision 5, Fire Protection Coordinator Duties and Responsibilities
- ADM 01-044, Revision 5, Results Engineering Supervisor Duties and Responsibilities
- ADM 02-007, Revision 5, Nuclear Station Operator Trainee Qualifications and Responsibilities
- ° ADM 02-103, Revision 8, Required Reading
- ADM 02-210, Revision 8, Operations Watchstation Qualification
- ° ADM 03-801, Revision 2, Health Physics Technician Training Program
- ADM 04-004, Revision 9, Chemistry Technician Training Program
- ADM 05-100, Revision 3, Results Engineering Organization and Responsibilities
- ADM 05-110, Revision 6, Results Engineering Personnel Qualification and Training
- ADM 05-401, Revision 3, Reactor Engineering Personnel Qualification and Training
- ADM 05-501, Revision 1, Results Engineer Technician Training Program
- ADM 06-200, Revision 9, General Employee Training
- ADM 06-211, Revision 3, Nonlicensed Operator Requalification Training
- ADM 06-230, Revision 6, Instructor Training, Qualification, Continuing Training, and Certification
- ADM OE-251, Revision 3, Crane Operator Training and Qualification
- ADM 08-205, Revision 6, Maintenance Department Training and Requalification Program
- ADM 08-221, Revision 3, On-the-Job Training Program for WCGS Maintenance Personnel
- ADM 08-805, Revision 5, Instrumentation and Control Personnel Training Program

- ACM 08-814, Revision 2, Instrumentation and Control On-the-Job Training Program
- ADM 13-200, Revision 3, Fire Protection Training Program
- ° KGP 1800, Revision 2, Training and Qualification Records
- KGP 1804, Revision 2, Assignment and Responsibility for Training Representative Duties
- ° KGP 1851, Revision 1, Professional and Suprevisory Training Program
- Course Content Letter, LOI 029, Revision 2, dated November 2, 1987
- Policy II.10.0, Revision A, Nuclear Operations
- Policy II.16.0, Revision 2, Nuclear Training Division
- Policy III.33.0, Revision 2, Indoctrination and Training
- ° KP 800, Revision 5, Training Division Organization
- KP 801, Revision 2, Manager Nuclear Training Qualification and Responsibilities
- KP 802, Revision 3, Superintendent General Training Qualification and Responsibilities
- KP 803, Revision 2, Superintendent License Training Qualification and Responsibilities
- KP 804, Revision 3, Supervisor Technical Training Qualifications and Responsibilities
- KP 805, Revision 3, Supervisor Academics Qualification and Responsibilities
- KP 807, Revision 2, Supervisor License Training Qualification and Responsibilities
- KP 844, Revision 2, Training Impact System
- o QPM 14, Revision 5, Training, Qualification, and Certification
- o QP 14.1, Revision 3, Training by Quality Department
- QP 14.2, Revision 4, Qualification and Certification of Inspection Personnel
- QP 14.3, Revision *, Qualification and Certification of Examination Personnel

- QP 14.4, Revision O, Qualification and Certification of Quality Branch Audit Personnel
- ° QP 14.5, Revision 1, Qualification of Quality Engineers
- ° QCI 12.1-001, Revision 2, Inspection of Housekeeping
- OA Audit Report TE: 50140-K180, dated October 9, 1987
- QA Audit Report TE: 50140-K186, dated November 16, 1987
- ° QA Audit Report TE: 50140-K191, dated January 20, 1988
- ° QA Audit Report TE: 'J140-K198, dated March 9, 1988
- QA Audit Report TE: 50140-K209, dated May 26, 1988
- OA Audit Report TE: 50140-K215, dated July 7, 1988

ATTACHMENT 2

The following LERs were reviewed:

LER Number	SUBJECT
86-008	Placing the Block Switch in "Permit" Results in Auxiliary Feedwater Actuation Signal and Steam Generator Blowdown Isolation Signal
87-018	Placing the Block Switch in "Permit" Results in Auxiliary Feedwater Actuation and Steam Generator Blowdown Isolation
87-030	Potential Transformer Failure Causes Partial Loss of Offsite Power and Reactor Trip and Subsequent Shutdown Sequence Actuation During Restoration
87-034	Ineffective Communication Allows For an Open Door Which Created a Control Room Pressure Boundary Breach
87-041	Personnel Errors Result in Loss of Power to Control Rod Movable Gripper Coils Causing a Reactor Trip
87-042	Personnel Error Leads to High-High Steam Generator Level Resulting in Feedwater Isolation Signal
87-048	Personnel Error - Improper Actions Cause Fatality and Results in Engineered Safety Features Actuations and Loss of Residual Heat Removal
87-049	Failure to Supply Temporary Power Source to Batteries Results in Battery Discharge Causing Multiple Engineered Safety Features Actuations
87-051	Engineered Safety Features Actuations - Procedural Deficiency Causes Two Main Feedwater Isolations and an Auxiliary Feedwater Actuation
87-057	Failure to Fully Understand Requirements Causes Technical Specification Violations - Hourly Rather Than Continuous Fire Watches Established

ATTACHMENT 3

Summarized below are the last 3 years requalification and initial examination results.

Year	Requalification Examination Results
1985	Twenty-seven SROs and five ROs took the examination with 96 percent of the SROs passing and 100 percent of the ROs passing the examination. After remedial training and reexamination all SROs passed. Three SROs were exempt from the examination because they prepared/administered the test. Two SROs were exempt because they had recently received their SRO license.
1986	Twenty-four SROs and five ROs took the examination with 88 percent of the SROs passing and 100 percent of the ROs passing. After remedial training and reexamination all SROs passed. Three SROs were exempt from the examination because they prepared/administered the test. Two SROs were exempt because they had recently received their SRO license. Six ROs were exempt because they had recently obtained their RO license.
1987	Ten SROs and five ROs took the examination with 90 percent of the SROs passing and 80 percent of the ROs passing. Upon remedial training and reexamination all SROs and ROs passed.
	Two SROs were exempt from the examination because they prepared/administered the test. Three ROs were exempt because they had recently obtained their operator's license. Eighteen SROs and six ROs were not selected due to the change to 10 CFR Part 55 which allows a biannual examination.
Year	Initial Examination Results
1985	Four SROs and one RO took their respective examinations with 100 percent of the SROs passing and the one RO failing. No reexamination was taken.
1986	Five SROs and nine ROs took their respective examinations with 80 percent of the SROs passing and 89 percent of the ROs passing. Upon reexamination all SROs and ROs had a 100 percent pass rate.
1987	Seven SkOs and six ROs took their respective examinations with 100 percent of the SROs passing and 67 percent of the ROs passing. Upon reexamination the ROs had a 100 percent pass rate.

The number of individuals licensed following the fall 1987 initial license examination totaled $34\ SROs$ and $17\ ROs$.