

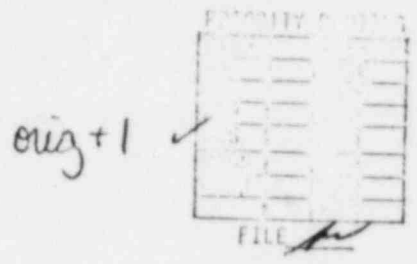
J. F. McMillan

Docket No. 50-346
License No. NPF-3
Serial No. 1-610
January 27, 1986



JOE WILLIAMS, JR.
Senior Vice President—Nuclear
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Mr. Luis A. Reyes, Chief
Operations Branch
United States Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137



Dear Mr. Reyes:

Toledo Edison is very proud of our past performance during examinations for both Reactor Operator and Senior Reactor Operator Licenses. We have established a pass rate for initial licenses of approximately 90%. This excellent pass rate was established and maintained through stringent entry level requirements into a very comprehensive training program and a thorough final selection process prior to allowing our operators to sit for the examinations. We were disturbed with the results of the licensed operator examination conducted November 19, 20 and 21, 1985 at Davis-Besse.

During recent conversations with my staff, I was informed that the quality of the written examinations, especially Category 5, did not appear to be up to the standard of excellence expected from the Nuclear Regulatory Commission. Several questions were vaguely worded which led to confusion on the questions' intent. The Answer Key identified specific responses, resulting in minimal partial credit.

The examination results for Category 5 on the written examination played a decisive role in three of the four SRO candidates being denied a Senior Reactor Operator License for Davis-Besse.

Additionally, one of the examiners appears to have expected an excessive amount of memorization from references readily available to the operators. Several individuals were required to simulate and discuss transients without the use of the Emergency Procedure EP 1202.01. The supplementary actions of this procedure were expected to be memorized in sequential order, and the detailed actions associated with these supplementary actions were routinely examined without procedural reference. Normal plant evolutions were also routinely examined without procedural references.

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Our policy for operating the Davis-Besse Power Station is outlined in AD 1839.00, Station Operations, which states in part:

"With the exception of the routine repetitive operations associated with normal operations of the plant, activities in the plant that are covered by Plant Procedures (PPs) and System Procedures (SPs) and Maintenance Procedures (MPs) should be accomplished with the procedure present and followed step by step. Those activities that may be accomplished without the procedure are to be marked in the procedure so that no person may inadvertently accomplish an activity without the procedure present when it is required."

This policy is expected to be followed at all times and is emphasized during operator training. While we do understand that a certain amount of procedural knowledge can be expected during an operational exam, we feel that an operating examination based primarily on procedural memorization is not a valid technique to assess the individual's ability to safely and competently operate the facility. This technique is unfair to the candidate and is not in line with the NRC policies on strict adherence to procedures during plant operation. These concerns were pointed out at the exit interview with the examiners.

Toledo Edison would appreciate a prompt rescheduling of the examination for these candidates. We have thoroughly reviewed the examinations and will complete an appropriate upgrade program by March 7, 1986. We request the NRC support an examination early in March, 1986 since these operators are vital to our overall recovery program.

My training staff would be willing to discuss with you more specific items from both the written and oral examinations at your convenience.

Thank you for your consideration in this matter.

Very truly yours,

Joe Williams Jr / JTW

JW:RAS:lah

cc: DB-1 NRC Resident Inspector