

October 16, 1998

Mr. John F. Franz, Jr.
Vice President, Nuclear
Alliant Tower
200 First Street SE
P. O. Box 351
Cedar Rapids, IA 52406-0351

SUBJECT: EXAMINATION WEAKNESSES (NRC INSPECTION REPORT
50-331/98301(OL))

Dear Mr. Franz:

This will acknowledge receipt of your letter dated September 21, 1998, in response to our letter dated August 21, 1998, transmitting Examination Weaknesses associated with the above mentioned inspection report at the Duane Arnold Energy Center. We have reviewed your corrective actions and have no further questions at this time. These corrective actions will be examined during future inspections.

In reference to your last comment, we agree with your comment that a decision to scram does not constitute a weakness, rather it may be a conservative action to a degrading plant condition. However, in this case, the candidate was not down graded because he took a conservative action, but that he failed to follow approved emergency operating procedures (EOP) when ample time was available. The procedure in question was EOP-3, "Secondary Containment Control," whereby the candidate was given Max Normal radiation conditions that did not warrant a plant shutdown. In fact, the emergency procedure directed him to verify no system discharge into the affected rooms, continue to monitor the radiation levels, and when the same two parameters exceeded the Max Safe limits to initiate a controlled reactor shutdown, not a reactor scram at high power. With indications of a possible fuel-clad leak, an unnecessary and significant mechanical transient, such as a reactor scram, could cause additional (extensive) fuel failure. Therefore, the performance of a reactor scram, in this case, was not the most conservative action. His actions could have potentially caused additional fuel damage (degraded the plant) due to the unnecessary mechanical transient.

Sincerely,

s/S. A. Reynolds

John A. Grobe, Director
Division of Reactor Safety

Docket No.: 50-331
License No.: DPR-49

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IEU 1/1

See Attached Distribution

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cc: E. Protsch, Executive Vice President
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K. Peveler, Manager, Regulatory Performance
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September 21, 1998
NG-98-1611

U.S. Nuclear Regulatory Commission
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Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Reply to Weaknesses Identified in Inspection Report 98-301(OL)
Reference: NRC Inspection Report No. 98-301(OL)
File: A-102

Dear Sir:

This letter and attachment are provided, as requested, in response to the weaknesses contained in the above referenced inspection report relating to the Initial Operator License examinations conducted at the Duane Arnold Energy Center in July 1998.

This letter contains no new commitments.

If you have any questions regarding this matter, please contact my office.

Sincerely,

John F. Franz
Vice President, Nuclear

Attachment

cc: R. Murrell
E. Protsch
D. Wilson
R. Laufer (NRC-NRR)
J. Caldwell (Region III)
NRC Resident Office
DOCU

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Reply to Weaknesses Identified in Inspection Report 98-301(OL)

The Duane Arnold Energy Center is continuing to review the weaknesses outlined in Inspection Report 98-301(OL) concerning the initial operator license examination conducted in July, 1998. The weaknesses identified will be used as feedback into the licensed operator training program in accordance with our Systematic Approach to Training process. Preliminary reviews of the results of the initial operator license examinations have determined that improvement opportunities currently exist in the areas of examination development and candidate preparation.

Concerning examination development, there is room for improvement in the development of written examination questions, job performance measures, and simulator scenarios. These improvements in the examinations are needed to assure the appropriate level of difficulty, improve the ability to discriminate between competent and less than competent candidates, and conform with the guidance contained in NUREG 1021, Interim Rev. 8. A contributor to weaknesses in examination development was our staff's newness to the examination development process and the complexity of the timelines associated with NUREG 1021. Attending the May, 1998, NRC Region III Examination Writers Workshop was helpful, but not an adequate substitute for experience with this process. Additionally, the selection of some Improved Technical Specification questions for the written examination was inappropriate. Specifically, some of the examples selected were at a complexity level that may have required an operator to obtain further consultations (e.g. Licensing support) prior to making the appropriate determinations.

With regard to candidate preparation, it has been determined that the candidates may not have been exposed to NRC style high level written examination questions early enough in the program to assure appropriate readiness for the written examination.

Corrective actions for these two areas and the inspection report identified weaknesses will be determined after completion of the review of the examination weaknesses in accordance with our Systematic Approach to Training process, review of initial operator license class lessons learned, and other activities as appropriate. These actions are expected to be completed by December 15, 1998.

We would like to take this opportunity to comment on a specific statement contained in the Inspection Report concerning a perceived weakness involving a candidate's performance during the Dynamic Simulator Examination. Specifically, the report states, "*Some applicants displayed weaknesses in performing abnormal and emergency operating procedures (EOPs). For example: (1) an SRO [senior reactor operator]*

applicant decided to conservatively scram the reactor after only receiving Max Normal indications on two area radiation monitors, contrary to the EOP directions...". We believe that inserting a manual scram, in response to degrading plant conditions, is based on the SRO's or operator's judgment and that this candidate's decision to scram does not constitute a weakness. The candidate's actions were consistent with our conservative operating philosophy. Our existing Administrative Control Procedure, ACP 1410.1, "Conduct of Operations," Section 3.6, "Reactivity Control," supports this position by stating: "All on-shift licensed Operators shall take action to reduce power or scram the reactor if necessary to ensure safety of the reactor or personnel."