

## UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION IV 611 RYAN PLAZA DRIVE. SUITE 400 ARLINGTON. TEXAS 76011-8064 OCT 2 7 1998

 G. R. Horn, Senior Vice President of Energy Supply
 Nebraska Public Power District
 1414 15th Street
 Columbus, Nebraska 68601

SUBJECT: RESPONSE TO YOUR POST EXAMINATION ANALYSIS

Dear Mr. Horn:

This letter is in response to Mr. Swailes' letter (NLS980171) dated October 13, 1998, regarding senior operator and reactor operator initial licensing examinations, which were administered at Cooper Nuclear Station during the period of September 25 through October 2, 1998. It is our understanding that Nebraska Public Power District is recommending that the written examination administered on September 25, 1998, be declared invalid. We also understand that if we agree with this conclusion, Nebraska Public Power District recommends voiding the written examination.

We are in the process of developing specific responses for each of the comments provided by Nebraska Public Power District on the initial examination which will be provided separately. On the basis of our work to date, we have confirmed some of the deficiencies identified in your post examination comments, while other comments do not appear to provide a sufficient basis to invalidate the applicable examination questions. However, we have not completed our review of each specific comment, nor have we reached any conclusion about the overall validity of the written examination.

In order for us to complete our review of this examination, we will need to obtain additional information from your staff. Accordingly, we request that your staff meet with us in the Region IV office. During this meeting, we request that you address the following topics:

- The specific basis for your recommendation that the written examination may be invalid. Please be prepared to discuss the cumulative impact of your individual comments on the overall examination sample outline, as described in "Operator Licensing Examination Standards for Power Reactors," NUREG-1021, ES-501, Section C.2.c.
- Our position (which will be provided separately) on your specific comments, for your use in future examination development. Our preliminary analysis is that, in a number of instances, your comments do not reflect the actual knowledge required to correctly respond to the question. For example, your position on a number of questions was that a question should be invalidated because the correct answer is written in a procedure or technical specification, which is not required to be memorized. However, this position did not reflect whether or not the general application of specific system knowledge would have allowed an applicant to correctly answer the question.

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- The results of your root-cause assessment and your corrective or remedial actions and schedule related to:
  - Any knowledge or ability weaknesses demonstrated by the applicants,
  - Changes to the training program content or duration for this license class, and
  - Your proposal for re-examination of the license applicants.

If you have any questions regarding this matter, please contact me at (817) 860-8180. We request that your staff contact Mr. John Pellet at (817) 860-8159 to schedule this meeting.

Sincerely,

Arthur T. Howell III, Director Division of Reactor Safety

Docket No.: 50-298 License No.: DPR-46

CC:

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Kansas Radiation Control Program Director

bcc to DCD (IE42)

bcc distrib. by RIV:

Regional Administrator DRP Director Branch Chief (DRP/C) Branch Chief (DRP/TSS) Project Engineer (DRP/C) Robert Gallo Laura Hurley

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