



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
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September 19, 2007

Richard M. Rosenblum
Senior Vice President and
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SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 - NRC
EXAMINATION REPORT 05000361/2007301; and 05000362/2007301

Dear Mr. Rosenblum:

On June 8, 2007, the U. S. Nuclear Regulatory Commission (NRC) completed the operating examination at your San Onofre Nuclear Generating Station, Units 2 and 3. On July 12, 2007, your facility administered the written portion of the examination. The enclosed report documents the examination findings, which were discussed on August 21, 2007, with Dr. R. G. Waldo and other members of your staff.

The examination included the evaluation of five applicants for reactor operator licenses, two applicants for instant senior operator licenses and two applicants for upgrade senior operator licenses. The written and operating examinations were developed using NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 9. The NRC regional office determined that four of the nine applicants satisfied the requirements of 10 CFR Part 55, and the appropriate licenses have been issued.

No findings of significance were identified during this examination.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Anthony T. Gody, Chief
Operations Branch
Division of Reactor Safety

Southern California Edison Company

-2-

Dockets: 50-361; 50-362

Licenses: NPF-10; NPF-15

Enclosure:

NRC Examination Report

05000361/2007301; 05000362/2007301

w/Attachment: Supplemental Information

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EXAMINATION REPORT

**U.S. NUCLEAR REGULATORY COMMISSION
REGION IV**

Dockets: 50-361; 50-362

Licenses: NPF-10; NPF-15

Report : 05000361/2007301; 05000362/2007301

Licensee: Southern California Edison Co.

Facility: San Onofre Nuclear Generating Station, Units 2 and 3

Location: 5000 S. Pacific Coast Hwy.
San Clemente, California

Dates: June 4 through August 21, 2007

Inspectors: Kelly Clayton, Senior Operations Engineer
Jim Drake, Operations Engineer
Mark Haire, Senior Operations Engineer

Approved By: Anthony T. Gody, Chief
Operations Branch
Division of Reactor Safety

SUMMARY OF FINDINGS

ER 05000361/2007301 and 05000362/2007301; 06/04 - 08/21/2007; San Onofre Nuclear Generating Station, Units 2 and 3; Initial Operator Licensing Examination Report.

The NRC examiners evaluated the competency of five applicants for reactor operator licenses, two applicants for instant senior operator licenses, and two applicants for upgrade senior operator licenses at San Onofre Nuclear Generating Station, Units 2 and 3. The facility licensee developed the examinations using NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 9. The written examination was administered by the facility on July 12, 2007. The NRC examiners administered the operating tests on June 4-8, 2007. The license examiners determined that four of the nine applicants satisfied the requirements of 10 CFR Part 55, and the appropriate licenses have been issued.

A. NRC-Identified and Self-Revealing Findings

No findings of significance were identified.

B. Licensee-Identified Violations

No findings of significance were identified.

REPORT DETAILS

4. OTHER ACTIVITIES (OA)

4OA5 Other Activities (Initial Operator License Examination)

.1 License Applications

a. Examination Scope

The examiners reviewed the nine applications submitted by the licensee for each of the license applicants. The applications were submitted on NRC Form 398, "Personal Qualification Statement," and NRC Form 396, "Certification of Medical Examination by Facility Licensee." The examiners also audited three of the license applications to confirm that they accurately reflected the subject applicant's qualifications. This audit focused on the applicant's experience and on-the-job training, including control manipulations that provided significant reactivity changes. All control manipulations were performed in the plant.

b. Findings

No findings of significance were identified.

.2 Operator Knowledge and Performance

a. Examination Scope

On July 12, 2007, the licensee proctored the administration of the written examinations to all nine applicants. The licensee called the regional office for a 1-hour extension at 2:30 p.m. Pacific Standard Time for the senior reactor operator applicants. They were granted a 1-hour extension and finished the examination during this time. The reactor operator applicants finished on time. The licensee staff graded the written examinations, analyzed the results, and presented their analysis to the NRC on July 19, 2007.

The NRC examination team administered the operating examination to eight applicants on June 4-8, 2007. One of the reactor operator applicants did not take the operating portion of the examination because he had taken and passed the operating portion of the examination during the October 2006 examination. This applicant requested and the NRC regional office approved a waiver of the operating portion of the examination in accordance with NUREG-1021. The remaining four applicants for reactor operator licenses participated in two dynamic simulator scenarios, in a control room and facilities walkthrough test consisting of 11 system tasks, and an administrative test consisting of 4 administrative tasks. The two applicants seeking instant senior operator licenses participated in two dynamic simulator scenarios, a control room and facilities walkthrough test consisting of 10 system tasks, and an administrative test consisting of 5 administrative tasks. The two applicants for upgrade senior operator licenses participated in two dynamic simulator scenarios, a control room and facilities walkthrough test consisting of 5 system tasks, and an administrative test consisting of 5 administrative tasks.

b. Findings

Of the nine applicants, four passed all portions of the operating test. One reactor operator applicant failed the written examination. Two of the reactor operator and two of the senior operator applicants failed the operating portion of the examination. For the written examinations, the reactor operator applicants' average score was 81.6 percent and ranged from 76 to 85.3 percent, and the senior operator applicants' average score was 87.7 percent and ranged from 81 to 90 percent. The overall written examination average was 84.3 percent.

1. Written Examination

Chapter ES-403 and Form ES-403-1 of NUREG-1021 require the licensee to analyze the validity of any written examination questions that were missed by 50 percent or more of the applicants. The licensee conducted this performance analysis for every question that was missed by more than 30 percent of the class (required by the licensee's procedure) and submitted the results to the chief examiner on July 18, 2007. The 23 questions that met the 30 percent failure criteria are discussed below. This analysis concluded that 20 of the questions (1, 3, 5, 10, 14, 15, 17, 30, 34, 39, 46, 47, 49, 55, 56, 61, 65, 89, 90, 96) were technically accurate and required no post-examination changes. For each of these items the licensee's staff determined that generic weaknesses existed in these topical areas and a broad action request form was entered into their corrective action program for the written examination training weaknesses (Action Requests 070700719 and 20). The topics for the questions missed by 50 percent or more of the applicants and/or those that were challenged are listed below:

Q1: Reactor coolant pump seal design (8/9 missed)

Q13: Loss of coolant accident effects on fuel integrity (6/9 missed, **challenged**, see below)

Q14: One hour technical specifications (5/9 missed)

Q17: Steam pressure instrument failure effects on steam bypass control (6/9 missed)

Q39: Actions on loss of 1E battery charger (5/9 missed)

Q47: Actions on pressurizer pressure instrument failure with safety signal (8/9 missed)

Q55: Resetting main steam isolation signals during a steam rupture event (5/9 missed)

Q56: Start a main feedwater pump (4/9 missed, not 50 percent but a fundamental question)

Q61: Shutdown cooling entry conditions during tube rupture (5/9 missed)

Q68: Technical specification entry conditions (3/9 missed, **challenged**, see below)

Q71: Administrative radiation dose controls (9/9 missed, **challenged**, see below)

Q89: Conditions preventing Mode 6 entry (3/4 senior operator applicants missed)

Q90: Station blackout recovery actions (3/4 senior operator applicants missed)

The licensee's original examination analysis submittal (including the proposed challenged questions) recommended accepting two answers as correct for two of the questions (13 and 68) and recommended changing the correct answer for one question (71). The three recommended changes had a net impact of changing two failing grades to passing.

The NRC regional office branch chief formed an internal panel consisting of three chief examiners to review the three questions submitted by the licensee for challenge. During the week of July 23, 2007 the panel reviewed the questions and made an initial recommendation to the chief examiner for the examination. Further dialog between the chief examiner, the NRC regional panel, the licensee, and the Office of Nuclear Reactor Regulation (NRR), Operator Licensing Program Office, resolved the issues with all parties for the three question challenges listed below (with resolutions):

Q13: Accept only "B" for the correct answer.

Q68: Accept answers "A" and "B" as correct answers.

Q71: Change correct answer accepted from "C" to "A" (and only "A") as the correct answer.

The licensee's initial recommendations and the NRC's final resolution follow:

Reactor/Senior Operator Question 13

Given the following conditions:

- A large break loss of coolant accident has occurred with a loss of offsite power.
- The rupture occurs on a loop cold leg where safety injection Tank T-008 is connected to the reactor coolant system.
- Reactor coolant system pressure immediately lowered to containment pressure.
- Train A emergency diesel generator has failed to start on an engineering safety feature actuation system signal.
- Train B emergency diesel generator has just received its engineering safety feature actuation system signal to start.
- Safety injection tank pressures at the start of the transient were 600 psia.
- Reactor vessel plenum level is 0 percent.

If this condition continues, which one (1) of the following describes the effect on the fuel assemblies?

- A. Fuel failure will not occur. Safety injection tank injection pressure is insufficient to reflood the core.
- B. Fuel failure will not occur. The large break loss of coolant accident analysis assumes one safety injection tank does not inject.
- C. Fuel failure may occur. Safety injection tank injection pressure is insufficient to reflood the core.
- D. Fuel failure may occur. The large break loss of coolant accident analysis assumes one safety injection tank does not inject.

Proposed Answer: C

Accept both answers "C" and "D" as correct answers. The large break loss of coolant accident analysis assumes that all of the safety injection flow to the affected reactor coolant system loop, including the injection flow from the safety injection tanks, goes out the break. Therefore, answer "D" is also a correct answer.

NRC Resolution

The licensee's recommendation was not accepted. The comment regarding answer "D" was partially correct in that the large break loss of coolant accident analysis does assume one safety injection tank does not inject. However, the first part of answer "D" was incorrect in that fuel failure would not occur because safety injection tank pressures at the start of the transient (600 psia) were above the safety injection tank pressure assumed in the large break loss of coolant accident safety analysis report (595 psia). This discussion also made answer "C" incorrect because the safety injection tank injection pressure was sufficient to reflood the core. The chief examiner concluded that answer "B" was the only correct answer. This discrepancy occurred because the technical specification bases pressure discussed for this event was 600 psia while the absolute minimum pressure defined in the final safety analysis report was 595 psia. After discussing this issue with the licensee again, they agreed that "B" was the only correct answer.

Reactor/Senior Operator Question 68

Which one (1) of the following conditions requires entry into a technical specification action statement while Unit 2 is at 80 percent power?

- A. Diesel Generator 2G002 Fuel Oil Day Tank level is 29 inches.
- B. Fuel Oil Storage Tank 2T-035 level is 45,850 gallons.
- C. Reactor Coolant System Tcold is 541F.
- D. Charging Pump 2P-191 is tagged out for repairs.

Proposed Answer: A

Licensee Recommendation

Since Technical Specification 3.8.3 was recently revised, which changed the fuel oil storage tank level, answer "B" is also correct.

NRC Resolution

The licensee's recommendation was accepted. Technical Specification 3.8.3 was revised a few weeks before the examination was administered and the applicants were aware of the revision. This revision changed the minimum fuel oil storage tank level from 41,800 gallons to a range of greater than 41,800 gallons and less than 46,400 gallons during MODES 1, 2, 3, or 4. Since 45,850 gallons is within this technical specification range, this revision change made answer "B" also correct. The chief examiner agreed with the licensee that answers "A" and "B" were both correct answers.

Senior Operator Question 71

A new San Onofre Nuclear Generating Station employee has the following radiation exposure in 2007:

- US Navy - 1825 mrem.
- Pacific Gas and Electric at Diablo Canyon - 90 mrem.

Without Health Physics Manager authorization, which one (1) of the following is the maximum dose this employee may receive at San Onofre Nuclear Generating Station in 2007?

- A. 85 mrem
- B. 175 mrem
- C. 1085 mrem
- D. 1910 mrem

Proposed Answer: C

Licensee Recommendation

The question did not state in the stem that an extension had been approved by the health physic supervisor. The health physics supervisor approval is required for all extensions. The health physics manager approval is required in order to exceed 3000 mrem (combined onsite dose + offsite dose). This makes "A" the correct answer.

NRC Resolution

The licensee's recommendation was accepted. Procedure SO123-VII-20, Section 6.5.4.1, states, "All dose extensions are approved by the Supervisor, Health Physics Operational Support. Additional approval may be required as specified below." Because the stem of the question specifically identifies the health physics manager and not the health physics supervisor, it was unclear as to whether the health physics supervisor has authorized an extension. NUREG-1021 specifically states that an applicant can not make assumptions while taking the examination about information not

provided in the stem of the question. This would imply that the health physics supervisor had not authorized an extension for dose, which is capped at the supervisor level in the licensee's administrative procedures at 2000 mrem. Therefore, the chief examiner agreed with the licensee that "A" was the only correct answer.

2. Operating Examination

Candidate performance during the administration of the operating examination revealed a number of potential training deficiencies. For example, one potential training issue involved the failure to follow procedures and failure to maintain adequate place-keeping during procedure usage. This potential training issue appeared to impact the total number of operating test failures. The licensee opened Action Request 070600262 for this deficiency.

Additional generic weaknesses on the operating examination included the senior reactor operators' inability to make accurate technical specification assessments during the scenarios. This was a noted deficiency from the October 2006 examination and it was apparent that it had not been corrected prior to this examination. During questioning of the licensee's staff it was noted that no actions had been taken from the previous Corrective Action AR 061100554 to address this problem. Two of the four senior operator applicants failed the operating portion of the examination because of incorrect or lack of technical specification entries.

3. Initial Licensing Examination Development

a. Examination Scope

The licensee developed the examinations in accordance with NUREG-1021, Revision 9. All licensee facility training and operations staff involved in examination preparation and validation were on a security agreement. The facility licensee submitted the integrated examination outlines on February 12, 2007. The chief examiner identified a repeat issue from a previous review of examination outlines in October of 2006. During the October 2006 outline review, the chief examiner identified that the outlines were not prepared in accordance with NUREG-1021, Revision 9, Note 4 of the ES-401-2 form. This requirement specifies that all topics be selected once prior to selecting a topic for a second time in order to provide balance to the examination and, therefore, prevent bias in any one area or topic. The licensee used a computer-based automated sampling program that sampled two items in the Tier 1 Group 1 area prior to sampling all topics in that area. This biased the examination towards the topics selected on reactor trip and recovery and omitted topics on anticipated transient without scram and station black-out. The chief examiner required the outlines to be corrected.

The chief examiner's review of the outlines for this examination on February 16, 2007, resulted in the same comments regarding a sampling problem to the licensee that were present on the last examination. The automated program had not been repaired from the October 2006 exam and the outlines were required to be changed again.

NUREG-1021, Revision 9, currently allows the use of industry-wide programs that are used by many licensees, such as a "Westinghouse-style" program or other commercial off-the-shelf programs; however, it is silent on independent programs other than the rules that must be followed in the standards. The licensee's staff and the chief examiner

are the final checks against these types of errors. The chief examiner reviewed this deficiency against the requirements and standard and found that the impact on examination integrity was minor because only a few questions were impacted.

The written examination was delayed because of a potential examination security issue that is discussed below in the examination security section of this report. Because of the potential security issue, the licensee replaced all bank questions with newly written questions. The NRC's regional office delayed the written examination date until this issue could be resolved. This issue was resolved on June 29, 2007, and the review of the draft written examination continued. Two written examination questions were replaced because of errors found in the technical specifications during NRC internal reviews of the draft written examination during the week of April 23, 2007. These items were turned over to the licensee for immediate resolution and were documented in the corrective action program as Action Request 070400911. Additionally, the resident inspectors were informed of this error in the technical specification. All the comments were resolved and the NRC regional office approved the written examination for administration on July 12, 2007.

The examiners conducted an onsite validation of the operating examinations and provided further comments during the week of May 14, 2007. The licensee satisfactorily completed comment resolution for the operating examination on June 1, 2007.

b. Findings

The examiners approved the initial examination outline and advised the licensee to proceed with the operating examination development.

The examiners determined that the operating examination initially submitted by the licensee was within the range of acceptability expected for a proposed examination. The examiners determined that the written examination initially submitted by the licensee was not within the range of acceptability expected for a proposed examination. In spite of this, the written examination was completely reviewed by the NRC's regional office and the process continued with the licensee until all questions were deemed satisfactory by the chief examiner. The statistics for initial unsatisfactory questions exceeded the 20 percent threshold for unsatisfactory examination questions with 42 percent of the questions rated as unsatisfactory.

No findings of significance were identified.

.4 Simulation Facility Performance

a. Examination Scope

The examiners observed simulator performance with regard to plant fidelity during the examination validation and administration. One simulator fidelity issue occurred during a job performance measure of the operating examination. During Job Performance Measure S-7, the plant vent stack Radiation Monitor 2RT-7865 was supposed to detect a high radiation condition after the mini purge is initiated (Job Performance Measure, Step 9) and cause an alarm on Panel 57C10 that would require the applicant to stop the mini purge in accordance with the alarm response procedure for Panel 57C10, Containment Radiation High. The 7865 radiation model did not work as designed. The high radiation alarm was not automatically received and the graphical interface on the plant computer did not respond correctly for the high radiation value, as expected and as validated during the validation week. These conditions were overridden manually by the simulator operator for this job performance measure in order to complete the job performance measure for this applicant. This method of manually triggering these events during the job performance measure was duplicated for the remainder of the applicants that received this job performance measure as part of their examination. As a result, it did not affect the discrimination of the job performance measure for the applicants. The examiners noted that Radiation Monitor 2RT-7865 had similar fidelity issues during the October 2005 examination and the deficiency had not been corrected. These items are listed in the discrepancy system as Action Request 070801103.

b. Findings

No findings of significance were identified.

.5 Examination Security

a. Examination Scope

The examiners reviewed examination security for examination development and during both the onsite preparation week and examination administration week for compliance with NUREG-1021 requirements. Plans for simulator security and applicant control were reviewed and discussed with licensee personnel.

b. Findings

A potential compromise was first reported to the NRC regional office by the licensee on April 18, 2007. A bank of emergency operating procedure questions that was deemed "closed" by the licensee was potentially compromised when a portable thumb drive was found with an examination "question bank" file of similar size and question content. The licensee decided to replace all questions on the draft written examination that were from this closed bank as a result of this issue. A formal investigation was conducted by the licensee with a report to the regional office on May 25, 2007, that concluded that no examination materials were compromised. The contents of the report did not include a detailed review of the contents of the thumb drive. In order for the NRC to positively verify that the contents of the thumb drive did not contain any potential examination questions or the existence of components on the proposed operating examination, the

chief examiner reviewed all 550 files on a compact disc copy of the thumb drive mailed to the region by the licensee's training department. An additional comparison of the database screen-captures for the actual examination bank file versus the thumb drive files in question revealed that the thumb drive file did not have the level of pedigree and information that the examination questions in the closed bank contained. Once this review was completed, the chief examiner concurred with the licensee's conclusion that no compromise occurred. The potential for wrongdoing by any of the applicants was negated through interviews by the licensee and file review by both licensee and chief examiner. Therefore, the NRC regional office approved the written examination for administration on July 12, 2007. Because of the large delay between the operating and written examinations, the NRC regional office requested and received permission from the NRR Operator Licensing Program Office to deviate from the required 30-day maximum deviation between the operating and written examinations as defined in NUREG-1021, Revision 9. The actual deviation between the two examinations was 34 days. This item was not captured in the corrective action program because the investigation involved individual interview information and is required to be withheld from public disclosure in accordance with 10 CFR 2.390(a)(6).

A second case for potential compromise of the written examination occurred during examination development and resulted in a minor violation of 10 CFR 55.40(b)(2). The licensee failed to follow their station procedures in controlling examination materials as required by Procedure SO123-XXI-8.5, Revision 5, Section 6.9.4. The potential compromise occurred when the licensee accidentally left a compact disc in a laptop that was returned to the licensee's Nuclear Information Systems department after a trip to the NRC's regional office. The NRC was notified of this event on July 6, 2007, and the ensuing investigation was documented in a separate report to the NRC dated August 6, 2007. The NRC concurred with the report and agreed that no compromise of examination materials occurred because the compact disc contained only operating examination materials and the operating examination had already been given when the laptop was released for use. This event was captured in the licensee's corrective action program as Action Request 070700238.

4OA6 Meetings, Including Exit

The chief examiner presented the examination results to Dr. R. G. Waldo, Vice President of Nuclear Generation, and other members of the licensee's management staff on August 21, 2007. The licensee acknowledged the findings presented.

The licensee did not identify any information or materials used during the examination as proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

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