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 RECIP. NAME RECIPIENT AFFILIATION
 COLLINS, P. F. Operator Licensing Branch

SUBJECT: Requests that Jan 1982 exams for senior reactor operator candidates not include simulator exams in response to NRC 810929 ltr. Subj candidates have already demonstrated proficiency in areas directly related to simulator exam.

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K. P. BASKIN
MANAGER OF NUCLEAR ENGINEERING,
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December 11, 1981

TELEPHONE
(213) 572-1401

Director, Office of Nuclear Reactor Regulation
Attention: Mr. Paul F. Collins, Chief
Operator Licensing Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Dear Mr. Collins:

Subject: Dockets Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3
Simulator Examinations for January 1982 SRO Candidates

Reference: (a) Letter dated 9/29/81 from Paul F. Collins to
K. P. Baskin

In early October, 1981 Southern California Edison (SCE) personnel were examined by the NRC for the purpose of being licensed as Reactor Operators (RO) and Senior Operators (SRO) at San Onofre Unit 2. These Cold License exams resulted in the issuance of 13 Reactor Operator Licenses out of 13 RO candidates and 2 Senior Operator Licenses and 10 Reactor Operator Licenses out of 18 SRO candidates. The results of the examinations are tabulated further as follows:

RO EXAMINEES (1)

<u>Number of Candidates</u>	<u>Number of Passing Grades</u>
13	13

SRO EXAMINEES (1)

<u>No. of Candidates</u>	<u>No. of SRO Licenses</u>	<u>No. of RO Licenses</u>	<u>No. of SRO Written Passes</u>	<u>No. of SRO Oral Passes</u>	<u>No. of RO Written Passes</u>	<u>No. of RO Oral Passes</u>
18	2	10	2	12	15	14

(1) Simulator Examinations not required - see reference (a)

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As a result of the relatively high number of failures in the written SRO category, the NRC requested SCE to examine the training program associated with the preparation for the October examinations and present our findings. The NRC also indicated that simulator examinations were being considered as part of any re-examinations of the candidates who did not pass the October examination and asked us to address this topic, as well. Subsequently, on December 3 and 4, 1981, SCE met with the NRC in Bethesda, MD. and discussed the resulting findings and corrective action.

During this meeting, SCE discussed the inappropriateness of requiring simulator exams for the SRO candidates who will be recommended for examination in January 1982. The information which follows documents and amplifies the information presented in those meetings.

SCE is committed to the use of simulators and believes that simulator training is beneficial to the long-term development of Reactor Operators and Senior Operators, and to this end SCE is building a simulator for San Onofre Units 2 and 3. Additionally, notwithstanding some misgivings about the validity of using a simulator unlike the San Onofre Units 2 and 3 Control Room, all of our operating personnel have completed a 2 to 5 week offsite simulator program at the Combustion Engineering Simulator as part of their RO and SRO pre-license training programs. We apply the identical policy for San Onofre Unit 1 License candidates, as well.

There are a number of reasons, however, why SCE considers that simulator examinations should not be given to the January candidates:

- (1) The use of an offsite non-unit specific simulator at this point in operator licensing is inappropriate. Because of the vast differences (see Attachment No. 1) between the San Onofre systems and CE simulator systems, we feel that a simulator exam, and the intense training which precedes the exam, would result in confusion which could be detrimental in two ways:
 - To the actual operation in the San Onofre Control Room, when the operator returns to San Onofre, and,
 - To the on-site oral and off-site simulator examination results.

- (2) We feel that simulator exams would not contribute to the proficiency of our operators. Our analysis of the October exam results shows deficiencies in the areas of Technical Specifications and Administrative Procedures primarily and, it is our belief that simulator examinations would not be particularly useful for improving or measuring this capability.
- (3) There are general questions from the human factors standpoint relative to how much positive or negative transfer would result from utilizing a simulator with such differences.
- (4) We believe that the capability to measure a candidate's response to plant specific transients and his use of plant specific procedures by a simulator exam on such a dissimilar system is marginal.

In addition to the above considerations, several of the October SRO candidates, having passed the RO and SRO oral exams in October, have already demonstrated proficiency in the areas directly related to the simulator examination. These candidates, whose names are indicated in Category 1 of Attachment No. 2, also have previous supervisory watch-standing experience, as shown.

We therefore see no basis for subjecting these individuals to an examination category in which they have already been successfully examined.

We believe, as well, that there is further basis for exempting from the simulator examinations all October SRO candidates, in that they were exempted from the original simulator examination and the examination results for these individuals do not indicate deficiencies that would be measured by a simulator examination. The names of these candidates are also indicated in Category 2 of Attachment No. 2. For similar reasons we do not feel a basis exists for simulator examinations of the October RO candidates who are now candidates for the SRO examination in January. The names of these individuals are also indicated in Category 3 of Attachment No. 2.

Mr. Paul F. Collins

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In conclusion, SCE has previously presented to the NRC the causes for the October, 1981 SRO written examination failures and the corrective action we are taking in preparation for re-examination in January 1982. We believe that the causes have been accurately identified and that the training actions we are taking are appropriate for those findings. Further, we do not believe that the results of a simulator exam will prove or disprove those corrective measures, nor do we believe that the exam will accurately reflect operator proficiency or result in increased reactor safety. We therefore request that the January 1982 examinations for SRO candidates not include simulator examinations.

Please contact me if you have any questions concerning this matter.

Very truly yours,

VP Boston

Attachments

cc: R. H. Engelken, Director
Office of Inspection and Enforcement
Region V

ATTACHMENT 1

MAJOR DIFFERENCES BETWEEN SAN ONOFRE SYSTEM AND CE SIMULATOR (CALVERT CLIFFS)

<u>SYSTEM</u>	<u>SAN ONOFRE</u>	<u>CE SIMULATOR</u>
Core Protection Calculator (CPC)	Yes	No
Core Operating Limit Supervisory System (COLSS)	Yes	No
Automatic AFWS	Yes	No
Manual AFWS	No	Yes
PORV's	No	Yes
Number of Auxiliary Feedwater Pumps	3	2
MWT Rating	3410	2500
Advanced Control Room Design	Yes	No

ATTACHMENT 2

SRO CANDIDATES JANUARY 1982

CATEGORY 1

<u>Name</u>	<u>PASSED SRO ORAL</u>	<u>PREVIOUS SRO RELATED EXPERIENCE</u>
Tate	Yes	SRO San Onore Unit 1
Kingsley	Yes	Engineering Watch Supervisor, USN
Eckman	Yes	SRO San Onofre Unit 1
Fisher	Yes	SRO San Onofre Unit 1
Elliott	Yes	Engineering Watch Supervisor, USN
Bromley	Yes	Engine Room Supervisor, USN
James	Yes	SRO Trojan
Brown	Yes	SRO San Onofre Unit 1
Lisitza	Yes	RO San Onofre Unit 1
Garza	Yes	Reactor Operator, USN

CATEGORY 2

<u>Name</u>	<u>PASSED SRO ORAL</u>	<u>PREVIOUS SRO RELATED EXPERIENCE</u>
Trillo	No	Reactor Operator, USN
Hyman	No	Engineering Watch Supervisor, USN

CATEGORY 3

<u>NAME</u>	<u>PASSED RO EXAM IN OCTOBER</u>
Shipman	Yes
Clement	Yes
Jones	Yes