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AUTH. NAME AUTHOR AFFILIATION
BARRON, H.B. Duke Power Co.
RECIP. NAME RECIPIENT AFFILIATION
ROE, R.W. Division of Licensee Performance & Quality Evaluation (Pos

SUBJECT: Discusses pilot requalification exam conducted on
910719-0802. Pilot exam suggested to explore methods to
evaluate operator performance, per 10CFR55, in less stressful
setting.

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Duke Power Company
Oconee Nuclear Station
P.O. Box 1439
Seneca, S.C. 29679

(803) 882-5363



DUKE POWER

August 26, 1991

Mr. Jack W. Roe
United States Nuclear Regulatory Commission
Division of Licensee Performance and Quality Evaluation, NRR
Mail Station P1-137
OWFN 10 H5
Washington, DC 20555

SUBJECT: Oconee Nuclear Station
Pilot Regualification Examination

Dear Mr. Roe:

The operators at Oconee Nuclear Station were very honored to be the first group to participate in a pilot requalification examination. The changes included in the pilot were clearly designed to reduce the level of stress involved in the examination process on the simulator. Thank you for your efforts to make the examination process better for the operators, the training instructors and the NRC examiners. This letter will summarize some of the observations and perceptions we have concerning the pilot examination.

The examination was conducted at Oconee from July 19, 1991 through August 2, 1991. There were four shift teams and two teams of backup licensees examined. There were four operators per team. Generally, there were two SROs and two ROs per shift team and three SROs and one RO per backup team.

One of the major changes in the pilot included a crew evaluation of critical tasks during the dynamic simulator examination. Critical tasks were identified for the scenario but completion of the critical tasks was not prescribed for any particular individual. The NRC did not conduct simulator pass/fail performance evaluations on individual operators during the dynamic simulator examinations. The operators felt the crew evaluation method of evaluating performance was significantly more fair and realistic than prior years individual evaluations. Team evaluations encourage teamwork. This was especially evident during the training sessions with those teams prior to the exam. Last year there seemed to be an artificial effort being made to ensure which individuals completed critical tasks. Too much emphasis was being placed on who completed the critical task, ensuring everyone on the crew completed at least one critical task, and working out the administrative controls to make this process go smoother. This year when operators were being evaluated as crews, the artificial individual requirements weren't a factor. More critique time was spent on teamwork and communication.

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Critiques were more focused on the team's performance. Evaluating crew performance is a good change identified in the pilot and should become the normal way of conducting dynamic simulator examinations. The next revision of the NRC Examiner Standards should include this change.

Another significant change noted in the pilot involved the Job Performance Measures (JPMs). The JPM questions were deleted from the examination process. The only questions asked were follow-up questions if there was a need to clarify some of the actions taken during the JPM. This was a welcome change to the JPM process. The awkward question/answer part of the JPMs should be permanently removed from the examiners standards. Because of the pilot change, there was no operator stress or evaluator stress about documenting answers. The artificial nature of the questions and answers detract from the JPM process not only in the examination mode but also in the training mode.

The static simulator examination was not changed during the pilot examination. However, I would like to recommend this part of the written examination be deleted during the next change of the examiner standards. The examination continues to be of limited value during training and testing. The amount of simulator time needed to support this type of examination method is not justified. Oconee would like to better utilize this time doing dynamic simulator training. The operators continue to comment about the useless nature of this exam. From their perspective a static simulator examination is just another exotic way to give a written exam. From the trainers perspective, huge amounts of effort are being made to prepare the static exams which should be used for dynamic simulator training. They have also said that the setting for a static simulator exam does not find operator weaknesses. The technique is not a useful training tool to help the operator become stronger. Static simulator examinations should not be required.

I would like to offer a comment concerning Faulted JPMs. This concept was relatively new to the operators but they seemed to handle the variation without much difficulty technically. However, this increased the stress level significantly for the operators. The JPMs were designed to capture the significant actions the operators needed to take in response to emergency situations addressed by emergency procedures. This material continues to be a great training tool and individual evaluation tool because the process teaches operators the correct way to perform tasks. Improvements in consistency have been a result of this process. Care should be taken to have the faulted part of the JPM included in the published JPM bank. This will again promote consistent operator action and response. Faulted JPMs could easily become an individual simulator examination if examiners allow the process to get out of control.

The dynamic simulator scenarios seem to be more difficult each examination. The operators performed well in this examination situation, but I feel a comment is warranted. Scenarios that are significantly beyond design bases are best utilized as training tools to promote a questioning attitude among the operators. Challenging scenarios should be used to improve the diagnostic skills of the operators, but extremely complex scenarios should not be used in examinations.

Scenarios such as a steam generator tube rupture with a simultaneous failure of the reactor to trip (ATWS) or a loss of coolant accident followed by a total loss of power would be examples of sequences that are near the limits of the emergency procedures and the simulators. Examinations at this level are beyond what should be required by the NRC. Guidelines which bound scenario difficulty may be worthy of review.

Mr. Mike Ernstes was the lead examiner for the Oconee pilot. Mike did an excellent job of implementing the standards of the pilot. When weaknesses were observed, Mike was receptive to using a variety of methods to explore those weak areas. When small weaknesses were observed, there was an acceptable agreement reached that allowed the training department to address the weakness without the NRC examiner feeling obligated to fail the individual. There was a trusting relationship that encouraged the training instructors to discuss weaknesses with the examiners without fear of over-reaction. The NRC examiners did not seem to feel obligated to fail anyone falling short of an excellent response. The lead examiner plays a significant role in the examination process. He sets the tone of the entire exam. Mike clearly tried to promote open discussions and objectively evaluate the operators and instructors. The lead examiner is a key component of the exam process.

The pilot exam was suggested to explore methods to evaluate operator performance as required by 10CFR55 in a less stressful setting. The pilot was clearly successful at meeting that objective. The stress level was significantly lower for the training instructors and the examiners, as well as the operators. Thank you for personally trying to improve the examination process. I appreciate your willingness to revise the operator licensing program and your interest in the operators.

Sincerely,



H. B. Barron
Station Manager

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