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PROGRAM

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1 UNITED STATES OF AMERICA
2 NUCLEAR REGULATORY COMMISSION

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4 BRIEFING ON STATUS OF REACTOR
5 OPERATOR REQUALIFICATION PROGRAM

6 ***

7 PUBLIC MEETING

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9
10 Nuclear Regulatory Commission
11 One White Flint North
12 Rockville, Maryland

13 Friday, October 7, 1988
14

15 The Commission met in open session, pursuant to
16 notice, at 10:00 a.m., the Honorable LANDO W. ZECH, Chairman
17 of the Commission, presiding.
18

19
20 COMMISSIONERS PRESENT:
21

22 LANDO W. ZECH, Chairman of the Commission

23 KENNETH M. CARR, Member of the Commission

24 KENNETH C. ROGERS, Member of the Commission
25

1 STAFF AND PRESENTERS SEATED AT THE COMMISSION TABLE:
2
3 S. CHILK
4 W. PARLER
5 J. TAYLOR
6 T. MURLEY
7 L. WIENS
8 K. PERKINS
9 J. ROE
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P R O C E E D I N G S

(10:00 a.m.)

CHAIRMAN ZECH: Good morning, ladies and gentlemen.

Today the Staff will brief the Commission concerning actions they have taken and results they have achieved in improving the administration of the NRC requalification examinations for licensed reactor operators.

After the September 10th, 1987 public meeting between the NRC Staff and the industry representatives, the Staff decided to suspend further NRC involvement in the administration of requalification examinations for NRC licensed reactor operators. This decision was made to assure that there was no adverse impact on the safety of licensed power reactors as a result of the NRC requalification examination process.

Since that date, the Staff has been working to improve the requalification examination process and to demonstrate its effectiveness by conducting pilot requalification programs at five utilities. These pilot programs have now been completed and the Staff will discuss the experiences gained from the pilot programs this morning.

I understand copies of the slides are available as you enter the room.

Do any of my fellow Commissioners have any comments to make before we begin?

1 (No response.)

2 CHAIRMAN ZECH: If not, Mr. Taylor, you may
3 proceed.

4 MR. TAYLOR: Good morning. Thank you, Mr. Chairman.
5 With me at the table are Doctor Murley and Jack Roe to my
6 right, and to my left are Ken Perkins, who is the Branch
7 Chief responsible for this area, and Lynn Wiens, who is the
8 Section Chief responsible for the requalification program
9 area.

10 I will now ask Doctor Murley to expand on the topic.

11 CHAIRMAN ZECH: All right. Thank you very much.
12 You may proceed.

13 MR. MURLEY: Thank you, Mr. Chairman. We are here
14 to give the Commission a status briefing on our program for
15 administering requalification exams to currently licensed
16 operators.

17 Last May, you recall, we described the background
18 of our revised requalification program. As you noted in your
19 opening remarks, we stopped examining a year ago in order to
20 revamp the entire program. We made it more operationally
21 oriented, more closely aimed at the operator's training and,
22 incidentally, less disruptive to the operators.

23 We now have five pilot examinations under our belt
24 at the Robinson plant, Fort Calhoun plant, Perry plant, Salem
25 plant and San Onofre. The feedback we are receiving is very

1 positive. That is that the exams are better exams and the
2 operators themselves view them more positively.

3 Ken Perkins and Lynn Wiens will review the new
4 program, highlight the results of the pilot exams, and the
5 plans for exams at each site. Thank you.

6 CHAIRMAN ZECH: Thank you very much. You may
7 proceed.

8 MR. PERKINS: Thank you. Good morning. After the
9 period that we took out some time to look at the exam process,
10 we began to develop and to test a new methodology for
11 assessing the effectiveness of facility requalification and
12 training programs and the proficiency of their operators,
13 while minimizing that potential impact on the plant safety.

14 (Slide.)

15 MR. PERKINS: We developed a prototype
16 requalification program which was tested at five facilities.
17 These were Salem, Robinson, Perry, Fort Calhoun and San
18 Onofre. There was one per each region and that was conducted
19 from the timeframe December, 1987 to June, 1988. We used
20 existing industry training program standards to develop and
21 administer the examinations.

22 By administering the requalifications examinations
23 that are consistent with the existing facility developed
24 continuing training program, the NRC reduced that impact on
25 the facilities and upon their operators, while improving the

1 reliability, validity and credibility of our program
2 assessments. No longer are we criticized for disrupting the
3 facility's systematic approach to training in order for
4 them to conduct training on what they expect the NRC to be
5 asking in our examinations.

6 (Slide.)

7 MR. PERKINS: To be compatible with our new
8 assessment methodology, the facility's requalifications
9 programs under evaluation had to be both systematically
10 developed and performance-based. The content of the
11 facility's continuing training program was derived from an
12 analysis of the performance requirements of the operator's
13 job. That is a job task analysis was performed to determine
14 the frequency, difficulty, and importance of various tasks
15 performed by the licensed personnel.

16 The job task analysis identified the knowledge,
17 skills and abilities -- I may slip into calling that KSA's
18 later -- required to perform the operator's job. The
19 training staff utilized those job task analyses and
20 appropriate management feedback on operator's performance
21 in developing the continuing training program. The topics
22 selected for training emphasized infrequently performed job
23 related tasks and associated knowledge skills and abilities
24 important to reactor safety. It also emphasized new or
25 modified equipment and procedures and safety-significant

1 nuclear industry events.

2 Each NRC requalification examination under the
3 new methodology included an operating test and a written
4 exam, each of which was comprised of two distinct parts.

5 (Slide.)

6 MR. PERKINS: The first part of the operating test
7 was conducted in a simulation facility which allowed the
8 examiners to observe selected control room crews during
9 simulated transient and accident scenarios. The focus during
10 this portion of the examination was on the crew, rather than
11 on the individual, with emphasis on the evaluation of time
12 critical and team-dependent behavior.

13 (Slide.)

14 MR. PERKINS: Each scenario was developed to
15 facilitate evaluation of all crew members at their appropriate
16 licensed level by exercising their abilities in the use of
17 emergency operating procedures, the emergency response plan,
18 and the facility's technical specifications. The scenarios
19 were verified against the facility's requalification program
20 learning objectives prior to administration and were reviewed
21 to ensure all required tasks met minimum importance rating
22 criteria, as identified in the NRC's Generic Knowledge and
23 Abilities Catalog or the equivalent document of the facility.

24 The NRC examiners and facility representatives
25 worked in concert to identify critical tasks that were

1 crucial to plant safety in each scenario. The success of a
2 crew or individual to correctly perform these tasks
3 established a basis for satisfactory evaluation on this
4 portion of the examination.

5 CHAIRMAN ZECH: During that simulator exam when you
6 are examining crews, how does that crew performance affect
7 your evaluation of the individual operator?

8 MR. PERKINS: In evaluating an individual on a
9 crew, you look at their interaction with the team, their --
10 depending on the respective position that they are in --
11 their ability to carry out that responsibility and to
12 communicate it with the other team members on the crew.

13 CHAIRMAN ZECH: So, you are trying to evaluate both
14 the crew and the individuals.

15 MR. PERKINS: And the individuals. But the
16 emphasis, as I mentioned before, is on looking at the crew
17 interaction.

18 CHAIRMAN ZECH: All right. Yes, I understand. But
19 also one individual I presume who really didn't do his part
20 of the team effort, you evaluate that.

21 MR. PERKINS: Yes.

22 CHAIRMAN ZECH: Then, of course, during the other
23 parts of the exam, I presume that you would expect him to not
24 be the last one on the totem pole every time.

25 MR. PERKINS: You would look for a balance.

1 CHAIRMAN ZECH: Is that what you are looking for
2 really?

3 MR. PERKINS: Yes, sir.

4 CHAIRMAN ZECH: The team and the individuals, you
5 are trying to do both when you are looking at those team
6 performances on the simulator.

7 MR. PERKINS: That is correct.

8 CHAIRMAN ZECH: Okay.

9 COMMISSIONER ROGERS: Just the obverse of that,
10 could the team fail but an individual member of the team pass?

11 MR. PERKINS: Yes, sir.

12 COMMISSIONER ROGERS: Okay.

13 MR. PERKINS: Okay. Next, I would like to speak
14 to the walk-through portion of the examination.

15 (Slide.)

16 MR. PERKINS: During the plant walk-through,
17 individual operators were evaluated on their ability to
18 correctly perform plant tasks that are important to safety.
19 The emphasis of this mode of testing was to ensure that the
20 operators had maintained their understanding of and their
21 proficiency in performing selected system tasks.

22 The facility trainers in concert with the NRC
23 identified a number of plant systems which play an important
24 role in protecting public health and safety. Systems which
25 were covered during the requalification cycle -- new or

1 recently modified systems, probable identified risk dominant
2 systems and components, and systems which were the subject of
3 recent licensee event reports or NRC generic communications --
4 were those emphasized in the selection process for the walk-
5 through.

6 The facility's job task analysis and the learning
7 objectives, as well as the NRC's Knowledge and Abilities
8 Catalog, were then reviewed to identify the salient tasks
9 to each of the selected systems.

10 Each of the identified tasks were then developed
11 into a job performance measure which was used in evaluating
12 the operator's adherence to specifics, performance, elements
13 and standards. The initial conditions, the initiating cues,
14 the references, the performance elements, the knowledge areas,
15 the output statements and critical steps were defined for
16 each of the job performance measures to facilitate evaluation
17 of the operator's abilities and underlying knowledge.

18 Each operator's walk-through evaluation tested his
19 or her ability to perform a selection of ten job performance
20 measures covering activities both in the control room and at
21 other locations throughout the plant. Some common job
22 performance measures were administered to each operator being
23 examined in an effort to assess the requalification program's
24 effectiveness, in addition to the individual operator's
25 proficiency.

1 Each walk-through examination was reviewed and
2 approved by the NRC prior to its administration. NRC
3 examiners monitored the examination process, asked questions
4 of the operators as necessary to ensure adequate system
5 knowledge and job performance measure coverage, and made
6 independent assessments of the operator's performance and
7 the evaluator's examination.

8 Next, I would like to speak to the written exam.

9 (Slide.)

10 MR. PERKINS: The written exam was a two-part open
11 reference examination administered to assess the operator's
12 knowledge of plant systems procedures and operating limits.
13 The plant operations section was administered on a static or
14 frozen simulation facility and was designed to evaluate the
15 operator's knowledge of the plant systems, integrated plant
16 operations, and instruments and controls.

17 This section has also been used to evaluate the
18 operator's ability to diagnose postulated events and to
19 recognize technical specifications limiting conditions of
20 operations. During this portion of the examination, the
21 simulation facility was frozen with the reactor either at
22 power but with some equipment in an abnormal status, or
23 shutdown as a result of a major transient. The operators
24 then used the simulator and any other material normally
25 available to them in the control room as reference tools in

1 answering written examination questions.

2 A minimum of two different frozen conditions were
3 evaluated. One of these involved a major transient with an
4 engineered safety features actuation system initiation. The
5 plant procedures section of the written examination was also
6 in open reference format but was administered in a classroom
7 setting. It was designed to evaluate the operator's ability
8 to analyze a given set of conditions and to determine the
9 proper procedural steps and administrative practices to
10 follow.

11 The operators were given access to the same abnormal
12 emergency and administrative procedures that would be
13 available to them in dealing with similar real world situations
14 in the control room. Normal procedures were de-emphasized in
15 the requalifications examination administration by the NRC.

16 (Slide.)

17 MR. PERKINS: The written examinations sections
18 were constructed primarily from proposed items provided in a
19 question bank by the facility. The NRC reviewed and modified
20 the proposed items as necessary to ensure accuracy, clarity,
21 importance to safety, and appropriateness for an open reference
22 format. Each item was tied to the facility's job task
23 analysis and satisfied the minimum importance rating in the
24 NRC's Knowledge and Abilities Catalog or an equivalent plant
25 specific document.

1 Both the facility and the NRC developed a plan
2 for drawing from the question bank of approved items and
3 constructing an examination. These test specifications were
4 used to determine the percentage of the examination to be
5 derived from various topic areas. The NRC examiner had the
6 opportunity to choose substitute NRC-developed questions to
7 round out the questions drawn from the question bank as a
8 check on examination security or to cover a topical area not
9 addressed by the facility. In fact, in the prototypes, the
10 NRC Staff participated actively with the facilities in the
11 development of the examination question bank.

12 The NRC examiners constructed the final examination
13 using their plan and the facility's best estimate of the time
14 required to respond to each test item to ensure that a
15 competent operator is able to complete the examination within
16 the allotted time. Prior to its administration, the completed
17 examination with proper security was subjected to a final
18 review by the facilities' training and operations
19 representatives to ensure clarity, technical accuracy, and
20 operational and safety significance.

21 (Slide.)

22 MR. PERKINS: The implementation of the new
23 requalifications methodology involved a significant
24 cooperative effort between the NRC examiners and the
25 facilities' training and operations staff. The NRC and the

1 facility licensees shared responsibility for every phase of
2 the examination process from development and administration
3 to grading.

4 The written examination items, the walk-through
5 job performance measures, and the simulator scenarios were
6 co-developed and agreed to by both parties prior to
7 administration. To the extent practical, objective criteria
8 were developed for evaluating the results of the operating
9 tests. Individual and crew performance during the operating
10 examination were monitored by the NRC and the facility
11 examiner, with both parties developing independent pass/fail
12 decisions. Similarly, examiners for both the NRC and the
13 facility utilized a pre-approved answer key to independently
14 grade each operator's written examination.

15 CHAIRMAN ZECH: Who were the examiners for the
16 facility?

17 MR. PERKINS: They would be individuals out of the
18 facility's training department and I believe, Lynn, they were
19 also people from the operations.

20 MR. WIENS: In one instance, they also utilized as
21 part of their normal program senior reactor operators from
22 the operations and the assistant operations supervisor.

23 CHAIRMAN ZECH: But the senior reactor operators
24 themselves participated in developing the examination; is
25 that correct?

1 MR. PERKINS: They participated in the quality
2 check on the examination for validity and accuracy.

3 COMMISSIONER CARR: Not all of them but some of
4 them.

5 MR. PERKINS: Some of them, yes, sir.

6 MR. WIENS: We had one senior reactor operator from
7 the operations department that was assigned as an advisor to
8 our team.

9 MR. PERKINS: Right.

10 MR. WIENS: And, who did not take the exam for the
11 purposes of requal, but he was our advisor.

12 CHAIRMAN ZECH: All right, fine. Thank you.

13 COMMISSIONER ROGERS: Were any of the evaluators
14 outside contractors?

15 MR. PERKINS: NRC evaluators --

16 MR. WIENS: There was no contractors.

17 MR. PERKINS: No contractor involvement. I'm sorry.

18 MR. WIENS: There were none.

19 MR. PERKINS: There is none.

20 COMMISSIONER ROGERS: Okay.

21 MR. PERKINS: All differences in opinion between
22 the NRC and the licensee regarding an operator's passing or
23 failing any portion of the examination were evaluated and
24 resolved. The licensee's ability to satisfactorily evaluate
25 the proficiency of its operators was the NRC's primary

1 criterion for evaluating the adequacy of its requalification
2 training program.

3 Although the NRC and facility licensee shared
4 responsibility for constructing, administering and grading
5 the examination, the NRC retained final authority for the
6 results.

7 I would like next to move to the summary.

8 (Slide.)

9 MR. PERKINS: Whereas the NRC's initial efforts to
10 evaluate facility requalification training programs were based
11 solely on individual operator performance, the new methodology
12 assessed both operator proficiency and program effectiveness.
13 It was founded on a performance-based systematic approach to
14 training techniques which minimized impact on the operators
15 and facilities, while improving the overall assessment
16 reliability through the use of passive evaluation techniques
17 and objective grading criteria.

18 Since it was based on industry-developed job task
19 analysis and tests the operators in their work-related
20 environment, the new process resulted in a more realistic
21 and operationally-oriented assessment than ever before. This,
22 coupled with the facility and NRC's shared construction,
23 administration and grading of the exams, has effectively
24 defused the criticism regarding the credibility of NRC-
25 administered exams and examiners.

1 CHAIRMAN ZECH: Well, what effect did the pilot
2 program have on the examination itself? In other words, did
3 you make modifications to your examination as a result of
4 lessons you may have learned during the pilot program, and
5 were they incorporated in what I would determine now you would
6 call the final examination?

7 MR. PERKINS: Yes.

8 CHAIRMAN ZECH: Can you give us some examples
9 perhaps of what you learned from the pilot program?

10 MR. PERKINS: Yes.

11 CHAIRMAN ZECH: And modifications that were made.

12 MR. PERKINS: In just a minute, I am going to ask
13 Lynn Wiens to give you some specific examples.

14 CHAIRMAN ZECH: All right, fine.

15 MR. PERKINS: But one of the points I want to make
16 is that as we proceeded through the prototype exams, lessons
17 learned from one were factored into the subsequent exams.

18 CHAIRMAN ZECH: I would like to hear about that a
19 little bit.

20 MR. PERKINS: Okay.

21 CHAIRMAN ZECH: Thank you.

22 MR. PERKINS: The new methodology has been very
23 favorably received by both the nuclear power industry and
24 their operators. By implementing a performance-based and
25 systematically derived evaluation methodology, the NRC has

1 provided impetus to the utilities to adopt compatible
2 training principles.

3 Nuclear Management and Resources Council --
4 NUMARC -- the Institute of Nuclear Power Operations -- INPO
5 -- and the Regional Utility Training Associations have
6 sponsored a series of workshops to assist the utilities in
7 making the transition to the new program.

8 Trials of the new examination program have been
9 highly successful. Each of the five pilot examinations
10 administered between December, '87 and June, '88 provided
11 valuable insights which were fed back into the program
12 during subsequent examinations. Facility and individual
13 operator performances on the pilot examinations were for the
14 most part satisfactory. The individual pass/fail decisions
15 made by the facilities and the NRC examiners were highly
16 consistent.

17 Now, to provide you with some specific examples
18 of the lessons learned during the prototype examinations, I
19 would like to introduce Mr. Lynn Wiens, who is the Section
20 Chief in the operator licensing branch, and who was present
21 at two of the prototype examinations.

22 CHAIRMAN ZECH: All right, thank you. You may
23 proceed.

24 MR. WIENS: All right. As Ken stated, I was the
25 Project Manager for the development of this revised

1 requalification program, and I did attend two of the pilot
2 programs at San Onofre and at Robinson. I am also a
3 certified examiner.

4 The feedback that I will be providing you is based
5 on my own interviews of operators and observations of the
6 exams that I attended, feedback that we have received --
7 written feedback -- from both the industry and from
8 individual operators concerning our program. In all areas,
9 and without exception, this program has been very well
10 received by all the operators. I think probably most of us
11 are all aware of that. It has also been well received by
12 the industry as I am sure you are aware of.

13 They felt that it was a fair exam and that it
14 evaluated them in those areas for which they are responsible
15 for operating the plant safely. One of the first feedbacks
16 which I will cover in the area of the simulator exam directly
17 relates to the question you had earlier, Mr. Chairman, on
18 the tasks which are necessary to be successfully performed
19 by an individual to be found successful on the simulator
20 portion of our examination.

21 The feedback recommended that we have a better
22 definition of what constituted those tasks for successful
23 performance. What we did is we have incorporated into our
24 guidance a definition for that, and we have included some
25 flexibility for our evaluators to make the decision on the

1 successful performance of those operators. So, we have
2 responded to the feedback in our current guidance.

3 In the effectiveness of the simulator exam, I have
4 several examples also that we found during our pilot program.
5 In two of the pilots there was identified weaknesses or there
6 was identified needs for training, additional training, for
7 the operators in the area of emergency operating procedure
8 usage. Also, we have identified a need for additional
9 training in the area of communications in one of the pilot
10 programs. This was all based on the simulator exam.

11 (Slide.)

12 MR. WIENS: All right. In the walk-through
13 examinations, again, this was well received by the operators
14 based on my interviews with operators, and they felt that
15 the method more closely followed the duties and the job that
16 they actually do in the manner in which we administered job
17 performance measures. They did have some recommendations for
18 improvements in this area also.

19 They felt that the followup questions that we asked
20 during the walk-through examination were many times
21 unnecessary and they didn't quite see the point for this.
22 These are the questions that would be asked based on the
23 examiner's observations during the walk-through. And, our
24 own examiners felt that they had difficulty determining the
25 grading and how it affected our grading. Certain operators

1 could receive varying numbers of questions based on their
2 own performance. We have as a result of that incorporated
3 into our guidance a method or clarification as to when these
4 questions should be asked, what they should relate to, and
5 how they would be factored into the individual's performance
6 criteria.

7 Secondly, in the area of the plant walk-throughs,
8 the feedback we received both from the instructors, the
9 training instructors at the facility, and from our own
10 examiners is that it is difficult to properly provide cues
11 to the operators of what the plant would respond based on
12 the operator's actions during the job performance measures.
13 What we have done in response to that is whenever possible
14 the walk-through, the job performance measure walk-through,
15 will be done in the plant simulator so that the simulator
16 will actually provide the cues to the operators.

17 Program effectiveness in this area, we have
18 identified operator weaknesses in various areas. For example,
19 in re-setting trip mechanisms on turbines, using plant
20 couriers for determining estimated critical positions,
21 verifying operability of vent stack monitors, these are areas
22 that we have determined that operators have weakness on. The
23 plants agreed and they are instituting additional training
24 for operators in those areas.

25 In the area of the written examination, the

1 operators, as I pointed out initially, they also were well
2 received, particularly on the fact that we have gone and are
3 using the open reference examination mode. They feel that
4 that is much more similar to the way they actually use the
5 references in their day-to-day operations.

6 (Slide.)

7 MR. WIENS: The feedback we have received from the
8 operators on that, almost unanimously they felt that they
9 were rushed for time to complete the examination. Our
10 evaluation in that area indicated several causes. One area
11 that we are recommending changes untiltimately be incorporated
12 into our guidance is that the exam will be time-validated by
13 operators who were not involved in the preparation of the
14 exam because those who were involved in the preparation were
15 too knowledgeable of the questions and it didn't give a true
16 validation of their time. They were not the operators who
17 were taking the exam of course. That wouldn't make any sense.

18 Also, the second feedback was that there was some
19 concern on the operators that they had difficulty getting to
20 the procedures to answer the question because there were
21 numerous operators taking the test at the same time who might
22 want to get to the same procedure. What we did to respond to
23 that concern is the questions in the examination are not in
24 the same order, so that the operators would not normally be
25 trying to answer the same question at the same time so that

1 the references would be spread around.

2 Also, we have identified areas that need
3 additional training as a result of the grading of our written
4 examinations also.

5 Now, overall program feedback, one area in
6 particular that we got an extremely positive feedback from
7 the utilities is in the use of the utility SRO as part of
8 the NRC team as an advisor to our team. The feedback, both
9 from the industry and from our own examination teams, they
10 felt like this was a particularly effective addition to our
11 examination process and ensured that the examinations were
12 operationally oriented and that the exams reflected the
13 current on-shift practice for that particular utility. It
14 really helped both the NRC people in preparing for the exam
15 and we found that even the utility training department, that
16 it really assisted them because sometimes they weren't quite
17 as up-to-date as they might have been.

18 The reliability and validity of the examinations
19 improved through involvement of the facility, as Ken
20 indicated in his presentation. The operators indicated that
21 the examination reflected their plant and the training that
22 they received during their program. The examiner
23 credibility improved through this program based on the on-site
24 preparation, the additional on-site preparation that we
25 included in this program. I interviewed a number of operators

1 and training department people and, without exception, they
2 indicated to me that the NRC examiners that they observed
3 during these requalification programs were very highly
4 professional and very well prepared and knowledgeable of the
5 plant and the material in which they were examining the
6 operators.

7 So, those are some of the examples of the feedback
8 I received and the improvements and enhancements we made to
9 our program based on that feedback.

10 CHAIRMAN ZECH: All right. Thank you very much.

11 MR. PERKINS: Okay. Since the completion of the
12 pilot test program last June, we have developed an examiner
13 standard to guide the administration of the new
14 requalification methodology.

15 Next, let's take a look to the future.

16 (Slide.)

17 MR. PERKINS: The program I have just described to
18 you is resource-intensive. We are implementing this program
19 this fiscal year. Over the next few months, however, we are
20 going to be evaluating some alternative approaches to
21 administering this program without changing it. The
22 alternative that we recommend, will be consistent with the
23 existing rule.

24 On this slide of options for the future, the first
25 alternative that we have presented is one which essentially

1 is the prototype which we have tested at the five sites and
2 described to you today. That is one where the NRC evaluates
3 the facility's program and conducts the examinations.

4 The second alternative which we will be evaluating
5 is one in which the NRC determines the acceptability of the
6 facility's requalification program. The facility conducts
7 the examination with NRC monitoring the conducting of that
8 examination. This would mean that the NRC would have an
9 individual present to observe the crews being tested and
10 examined in the simulator, and would be present for observing
11 the written examination of all of the members being examined,
12 and would monitor at least a portion of each of the
13 candidates as they were being taken through the walk-through.

14 The third alternative is an alternative in which
15 the NRC again determines the acceptability of the facility's
16 program and INPO/NUMARC would manage a team that conducts
17 the examinations with NRC again monitoring the conducting of
18 that examination. The Staff will continue evaluating these
19 alternatives over the next few months. We will continue to
20 meet with the office of General Counsel and with INPO and
21 NUMARC to discuss these alternatives.

22 The Staff plans to complete its evaluation of
23 alternatives and report back to the Commission with a
24 recommendation by the end of this calendar year.

25 At this point, I have concluded my prepared remarks.

1 If there are any questions which you have, I would be pleased
2 to respond.

3 CHAIRMAN ZECH: Let me just understand. What did
4 you say by the end of this calendar year? Are you
5 recommending any of these options at the present time?

6 MR. PERKINS: At the present time we are not. We
7 are just identifying to you the options or alternatives that
8 we will be evaluating, and we will come back to you with a
9 recommendation of one of these options.

10 CHAIRMAN ZECH: So, you don't have a recommendation
11 at this time.

12 MR. PERKINS: That is correct.

13 CHAIRMAN ZECH: All right.

14 MR. PERKINS: We just wanted to make you aware of
15 the options we are considering.

16 CHAIRMAN ZECH: All right, fine.

17 MR. MURLEY: I should point out, Mr. Chairman, that
18 we are moving ahead in the interim though doing exams or
19 planning exams at other sites. I don't have the details but
20 we haven't stopped Staff activity.

21 CHAIRMAN ZECH: But, in the meantime, are we
22 examining? Is the requalification program still operative?

23 MR. MURLEY: Yes.

24 MR. TAYLOR: Yes, sir.

25 CHAIRMAN ZECH: Is it in effect?

1 MR. MURLEY: Yes, sir, we are following the same
2 methodology.

3 CHAIRMAN ZECH: This pilot program or the one we
4 had before?

5 MR. PERKINS: No.

6 MR. MURLEY: No.

7 MR. PERKINS: We are implementing the pilot program
8 in this fiscal year.

9 CHAIRMAN ZECH: For all utilities.

10 MR. PERKINS: For all utilities who are ready for
11 us to implement it with.

12 CHAIRMAN ZECH: I see. So, you are really going
13 ahead with the pilot program --

14 MR. PERKINS: Yes, sir.

15 CHAIRMAN ZECH: -- you have got going with other
16 facilities now.

17 MR. TAYLOR: Yes.

18 MR. PERKINS: Yes, sir.

19 MR. TAYLOR: We think it is a considerable
20 improvement over the original program that we started.

21 CHAIRMAN ZECH: Uh-huh. But then by the end of
22 the year you will come back to us with a recommendation --

23 MR. TAYLOR: Yes, sir.

24 CHAIRMAN ZECH: -- for whether you should continue
25 to go with -- I think you talked about option one --

1 MR. TAYLOR: Yes, sir.

2 CHAIRMAN ZECH: -- or whether you should go with
3 one of the other two options.

4 MR. PERKINS: Yes, sir.

5 MR. TAYLOR: Yes, sir.

6 MR. MURLEY: Yes, sir.

7 CHAIRMAN ZECH: I see. All right. Does that
8 complete your briefing?

9 MR. TAYLOR: That concludes our briefing, yes, sir.

10 CHAIRMAN ZECH: All right. Questions from my
11 fellow Commissioners. Commissioner Carr.

12 COMMISSIONER CARR: Well, I think this is a much
13 improved program over the one we started with. One of the
14 best parts about it I think is you evaluate the trainees as
15 well as the trainers. At the same time, I think the more we
16 do this the better we will get at it. It is one of the most
17 important things I think we do for safety, the examination
18 and requalification of the people. I think it is a most
19 valuable use of resources and I would be supportive of all
20 the resources it would take for us to do this ourselves.

21 I think also it ought to be a learning experience
22 for both the guys being requalified as well as for our
23 examiners. It has been my experience that every time you
24 give an examination you learn something, and you should be
25 able, as you go around and get better at it, to pass those

1 tips along to the people you are examining.

2 I would encourage you to ensure that there is a good
3 sample of actual problems that have been experienced at plants
4 in your examinations to make sure that the lessons are being
5 learned that should be learned from each other. I would hope
6 that we have adequate personnel to take care of all those
7 alternatives, whichever one you come up with.

8 That's all I have.

9 CHAIRMAN ZECH: You have just heard from a top notch
10 examiner.

11 COMMISSIONER CARR: I have some experience in --

12 CHAIRMAN ZECH: I hope you took notes. Commissioner
13 Rogers.

14 COMMISSIONER ROGERS: Yes, I have got a couple of
15 questions and some remarks. First, on the remarks, I think
16 that your work on the development of this whole examination
17 process, how you have gone at it and the construction of the
18 exams, Commissioner Carr has already complimented you on it
19 but I think that it really is a first-rate job, everything
20 that I have seen about it. I really want to commend the
21 Staff for really moving in on this and taking a totally
22 fresh look at it and coming up with a much superior system
23 to what was there before from a professional examiner's point
24 of view.

25 I have a couple of questions. In your pilot

1 programs, did you find that you could meet the goal that had
2 been set of agreement between NRC and the facility examiners
3 of a five percent agreement on examinations scores on 80
4 percent of the written exams?

5 Did you have a chance to test that?

6 MR. PERKINS: Lynn, do you want to handle that?

7 MR. WIENS: Right. We consistently met that
8 requirement. As a matter of fact, it was so consistent --
9 our grades were normally I believe within about one percent
10 of the grading results -- that we do not even include that in
11 our current requirement. We didn't find any value to that
12 comparison.

13 COMMISSIONER ROGERS: Very good. Well, that was a
14 good test and I think it is very reassuring to hear that.
15 How about regional variations? The five pilot plants were
16 in all five regions, were they?

17 MR. PERKINS: Yes, sir.

18 COMMISSIONER ROGERS: One for each region. So, did
19 you see any regional variations in grading or scores?

20 MR. PERKINS: Again, I am going to ask Lynn, with
21 his experience, to comment on that.

22 MR. WIENS: Not significant. There were sometimes
23 problems of clarification required in our guidance that was
24 difficult for possibly one of the regions. However, when
25 those problems were identified, we incorporated the

1 clarifications necessary -- at least we hope that was
2 necessary -- into our guidance so that each region could
3 implement this program the same.

4 Now, as Ken pointed out, during the requalification
5 program itself or the pilot program, as we finished one pilot,
6 lessons learned from that we would incorporate into the next
7 pilot.

8 COMMISSIONER ROGERS: Yes. So, it was dynamic in
9 that sense.

10 MR. WIENS: Right. So, in that regard, there would
11 be differences --

12 COMMISSIONER ROGERS: Yes.

13 MR. WIENS: -- for example, between the Robinson
14 pilot and the Salem pilot.

15 COMMISSIONER ROGERS: Yes.

16 MR. WIENS: But in the nearer timeframe or where
17 processes didn't change, we didn't see significant differences
18 in the results that we considered substantial.

19 MR. PERKINS: I think one thing that I hope will
20 promote consistency from this point forward is we do have
21 the examiner standard out now for guidance and, also, we have
22 held the four workshops in order to get the information out
23 to everyone about simultaneously.

24 COMMISSIONER ROGERS: Well, I think it is important
25 to keep that in mind, that we try to eliminate this five

1 different NRC's problem that we have had in the past in some
2 areas and make sure that -- this is a particularly important
3 one -- that standards are exactly the same on the east coast,
4 the west coast, north and south, and that there is no
5 regional difference.

6 MR. PERKINS: Yes.

7 MR. ROE: Commissioner Rogers, I might add that we
8 are very much interested in that. So, we have taken
9 additional steps, other than what we have learned in the
10 requal, to attempt to standardize our practice as much as
11 possible. Ken has a weekly conference call, I think it is,
12 with his regional representatives --

13 MR. PERKINS: Conference.

14 MR. ROE: -- in the operator licensing program to
15 discuss how we are actually carrying it out. We have
16 tightened up in some of the areas. Our guidance limited the
17 flexibility with still retaining an adequate amount for the
18 regions. Additionally, our headquarters certified examiners
19 upon occasions conduct exams with the regional people to get
20 firsthand experience and understand what actually is going on
21 out there.

22 COMMISSIONER CARR: Well, you can also mix the
23 teams up from the region so you don't have a region team and
24 take people from all regions to put together a team, I would
25 think.

1 MR. ROE: We have taken that approach specifically
2 in our EOP inspections that are somewhat analogous to
3 licensing inspections or looking at actual practices of the
4 utilities where the teams are comprised of individuals from
5 various regions and go from region to region instead of just
6 their own facilities.

7 MR. WIENS: In the pilot program, we did have
8 examiners from various regions participate in at least
9 several of the pilots so that there was cross-information
10 between regional examiners.

11 COMMISSIONER CARR: Piggyback one more on you.
12 There is one thing I would caution you against and that is
13 to think that it is going to get easier to examine after the
14 pilot program is over than it was during the pilot program.
15 You are going to find that it takes just as much preparation
16 to do an exam anywhere, anytime, as it did for those pilots.
17 Preparation in the critique are as important as the exam
18 itself.

19 COMMISSIONER ROGERS: You see, the fact that some
20 plants do not have plant specific simulators, being a big
21 problem in the completion of this first cycle by 1989, for
22 instance, how many plants will not have plant specific
23 simulators by say January 1st, 1989? How serious is that
24 going to be in how you proceed with this program?

25 MR. WIENS: Do you want me to answer that?

1 MR. PERKINS: Yes, if you would.

2 MR. WIENS: Well, I don't see it as a problem. We
3 did one pilot at Fort Calhoun that did not have a plant
4 specific simulator. We were able to compensate for that on
5 the written exam where we do use a simulator by using a mock-
6 up. We have contingency plans for those plants -- a static
7 mock-up -- for those plants that don't even have that, such
8 as using control board panel photographs of the panels and
9 construct our examination towards those devices.

10 For the crew evaluation, the simulator portion,
11 since on the team evaluation we are looking for team
12 interaction, time-dependent actions, we have determined on
13 our one pilot at Fort Calhoun where we used the Windsor Lock-
14 CE simulator, non-reference simulator, that for that type of
15 competencies that we are looking at, that we could adequately
16 evaluate the team performance on the non-reference simulator.
17 So, we would use the same approach on any other facility that
18 did not have one.

19 COMMISSIONER ROGERS: So, you don't see that as a
20 big impediment.

21 MR. WIENS: I do not.

22 COMMISSIONER CARR: That's the one they normally
23 train on anyway.

24 MR. WIENS: That is correct.

25 COMMISSIONER ROGERS: Just with respect to your

1 options for the future, I agree with Commissioner Carr that
2 I would really like to see us do this ourselves all the way,
3 but I know that there is a resource problem and that is why
4 you are looking at options.

5 It seems to me that there is another option that
6 you might look into -- a fourth one -- that would be a little
7 different in terms of its difficulty with respect to getting
8 agreements, if we might have any problems with INPO, and
9 that would be to look at yet another organization to
10 participate in this such as the National Institute for
11 Certification of Engineering Technologists.

12 I don't know that that is the right one but I would
13 suggest that there might be another possibility besides having
14 INPO supply the person power to have another contractor that
15 might be able to do this that has an excellent reputation,
16 professional reputation. I am not making a judgment on that
17 particular organization but it does seem to me that if there
18 is a reluctance by INPO to take this on, then there might be
19 another alternative such as something of this type.

20 MR. PERKINS: Okay.

21 COMMISSIONER ROGERS: I would ask you to look at
22 that as well.

23 MR. PERKINS: We will add that to the list.

24 COMMISSIONER ROGERS: It looks to me like the
25 program is vastly improved and that everyone associated with

1 it is to be commended. Thank you.

2 CHAIRMAN ZECH: First of all, I would like to also
3 support Commissioner Carr's first comment regarding the high
4 priority that this program should be assigned. I'm not sure
5 that there are many things we do more important than
6 examining our operators to ensure that they have the
7 competence to protect the public health and safety.

8 I would be inclined at this time anyway to support
9 your first option that would have NRC conducting the
10 examination, and by whatever resources are necessary. That
11 is my inclination. I certainly understand the other options
12 and I will wait to hear the Staff's recommendation. I
13 appreciate the fact that you are looking for -- perhaps not
14 using quite as many of our own resources -- but my
15 inclination would be this is such an important program that
16 it should have the priority and perhaps we should continue
17 to support it ourself.

18 Let me say, too, I think you have done a very
19 excellent job -- certainly a job well done -- and a necessary
20 job too. As I recall, when I first came to the Commission
21 and started visiting the nuclear power plants, almost every
22 one, after talking with the operators and asking them about
23 what we could do to do a better job, that question would
24 usually come around to some kind of criticism of the
25 requalification program.

1 We have talked about it at various times and you
2 have heard my suggestions that you make it more systematic,
3 more integrated, more operationally oriented, and all those
4 things that it would appear to me you have done. So, I think
5 you have done an excellent job and I think it has benefitted
6 us to work with the utilities, with the industry, have them
7 participate in the program. With our strong oversight but
8 with their participation, I think it is certainly something
9 that we can look upon with a considerable amount of
10 satisfaction.

11 Also, I think you have taken a logical approach to
12 the program in that you have started with job task analysis,
13 what is necessary, and you have gone from there to describe
14 and feel confident I believe that you have described what
15 operators need to know, and then have it performance-based
16 too so that you watch them perform, and also integrated
17 because it is a team effort in these power plants and it is
18 important that not only each individual perform well but they
19 perform well as a team.

20 Now, to put together an exam that will allow us to
21 review all those different circumstances is not easy. I
22 think you have done an excellent job in considering both the
23 individual and the team efforts necessary for safety. I
24 really do think you have done an excellent job. It's a
25 significant improvement. As far as I can tell, it's an order

1 of magnitude improvement from what we were doing in the past.
2 That's why I do think it should have the priority and the
3 resources necessary to follow through.

4 I really do think doing it ourself is the right
5 thing to do. I don't know that we do too many things that
6 are more important than reviewing the qualifications of our
7 operators.

8 I believe making it operationally oriented and
9 truly relevant is so important and I think you have done that.
10 By that, I mean that you have made it realistic and practical.
11 At least, as I understand it, you have made it oriented
12 towards those situations that the operator may not see every
13 day. In other words, the emergencies that could come up but
14 the operator in his normal routine operational duty status
15 doesn't see those kinds of things. We hope he never sees
16 them. But at least if he is thinking about them and he knows
17 how to respond to them, not only individually but as a team,
18 that is very important and it does, indeed, contribute to
19 safety in my judgment.

20 So, focusing on those potential emergency situations
21 I think is extremely important. Also, I know from my own
22 experience that operators, when you get them in this frame of
23 mind, it stimulates their imagination and their own interests
24 in their plant. It stimulates them to ask the questions
25 "what if", you know, what if this would happen and what if

1 that would happen, what would I do, and they kind of end of
2 quizzing each other from time to time during the routine
3 watches and shift work that they stand. That is also
4 intellectual stimulation for operators that I think is good.
5 If your exam can stimulate those kind of questions and that
6 kind of thinking and that kind of alertness on the part of
7 operators, I think that has a side benefit that is rather
8 significant.

9 So, you stimulate the operators themselves to
10 think of what they would do if kinds of things and that
11 allows them to think of the plant in a more realistic way in
12 my judgment than looking at the boards and the instruments
13 and the switches and knobs and so forth because what it does,
14 in my judgment, it makes them think about when I throw that
15 switch what happens all the way through the system and they
16 think of the control system that may be working and how does
17 that interphase with the hydraulic system and the reactor
18 itself and the heat, the steam and so forth, and it puts
19 them in a different frame of mind than just kind of
20 performing at the board and throwing switches. It stimulates
21 their thinking as to what really they are doing, what happens
22 in that plant.

23 I think that kind of encouragement or that kind of
24 stimulation is very healthy for our operators who, as we all
25 know, under most circumstances are in the control room in

1 quite a routine and normal situation. But to stimulate their
2 thinking about their plant, to me, is a very important benefit
3 from this whole requalification program.

4 Those are my general comments. I do want to commend
5 you again for what I think is one of the finest programs the
6 Staff has undertaken since I have been here. You have taken
7 a program that did have problems and you have turned it into
8 what could be potentially I think a very valuable significant
9 contribution to reactor safety. I commend the Staff for that
10 effort and those of you -- I commend the industry and the
11 utilities who have participated with you in order to achieve
12 what I think could be a very significant improvement.

13 Commissioner Rogers.

14 COMMISSIONER ROGERS: Just one question that
15 occurred to me while you were making your presentation.
16 That is what are you doing about the possible career paths
17 and prospects for the future for the examiners, the NRC
18 examiners? My impression, in looking into this program
19 during the summer, was that that was a serious issue within
20 the agency as to how the people who were involved with
21 playing the role of examiners viewed themselves and viewed
22 their career prospects within the agency, if we see this as
23 a really important activity and I think we all do.

24 MR. TAYLOR: Yes, sir.

25 COMMISSIONER ROGERS: Then we must take particular

1 pains to see that the best people and the most qualified
2 people are interested in doing this and that it is not a
3 deadend for them but at least a reasonable alternative on a
4 career path within NRC to other things that they might do
5 such as being a resident inspector.

6 I wonder what your thinking on that is. If you
7 haven't done a lot or haven't come to any conclusions on it,
8 it seems to me that it is very important that you think about
9 that in connection with option one. If we are going to do
10 this ourselves, that that be a key element in it. It is just
11 not the number of people but the quality of people, their
12 dedication and commitment to this, that will have to be
13 sustained by our doing the right thing by them.

14 MR. TAYLOR: We know that is happening. So, I will
15 let Jack and Tom give you the specifics.

16 MR. MURLEY: First, let me say that we agree
17 totally with you that we have to make the examiner positions
18 not only attractive but give them the stature commensurate
19 with the safety importance of what they are doing. That
20 probably hasn't been the case in the past and we have seen
21 fairly high attrition among the examiners. We find that there
22 is a general flow of examiners toward the resident inspector
23 ranks because we have placed a lot of emphasis on resident
24 inspectors -- properly so -- but now we have got to pay
25 attention to the examiners as well.

1 We have a number of options that we are looking at.
2 We are not prepared today to tell you exactly how we are going
3 to go but perhaps Jack can elaborate on that.

4 MR. ROE: Yes, sir. As Doctor Murley indicated, we
5 have a range of options. We have developed those options and
6 made proposals to the Executive Director. I know that they
7 are under active evaluation now and I expect after the first
8 of the year that we will be able to report back to you what
9 actions we are going to take.

10 COMMISSIONER ROGERS: Just one parting word and
11 that is that it seems to me that this whole process that has
12 been invoked here is one that can teach us all a lesson as
13 to what we can do in the future. Namely, we had a program
14 that was functioning but had problems with it and, instead
15 of just patching it up and bandaiding it, we stopped it and
16 took a fresh look at it and started almost all over again.
17 I think that is a very salutary thing for us to consider
18 doing at any time in any aspect of our work at the Commission
19 where it seems to be called for.

20 MR. TAYLOR: Commissioner Rogers, thank you. We
21 will include some information about the examiner career path
22 when we come back with you in the next couple of months to
23 give you our final position on the program. By that time,
24 I think we will have our thoughts pretty well in order.

25 CHAIRMAN ZECH: Commissioner Carr, anything else?

1 COMMISSIONER CARR: Yes, one more comment. I would
2 encourage you to continue to get feedback. You may want to
3 generate yourself some kind of a comment sheet. And, I would
4 suggest that the headquarters get those comments in addition
5 to the regions so that we at least get some look across the
6 whole examining system. It doesn't have to be a big thing
7 but you do need continuing feedback.

8 MR. TAYLOR: Yes, sir.

9 CHAIRMAN ZECH: That has been my experience too, in
10 this program you should consider it kind of a living program
11 because feedback really will continue to improve your program
12 as you go along. It is very important to do that.

13 I would just like to support Commissioner Rogers'
14 point -- I'm glad he brought that out -- too about examiners
15 and their tremendous importance to us. I have had the
16 opportunity to talk to them on occasion and I have been
17 impressed, frankly, by the examiners we have. It is not an
18 easy job because they are on the road so much, as I understand
19 it. Many of them are, anyway.

20 I really have been impressed by the motivation and
21 the dedication of many of the examiners we have had because
22 they seem to have, at least in my judgment, a very keen
23 commitment to safety and an obligation that they feel they
24 have to pass that along. I think that is commendable. And,
25 I do agree, as Doctor Murley points out, that we can do

1 better by our examiners and I agree with Commissioner Rogers
2 that we should indeed focus on this as a career path that
3 perhaps we can make some great improvements in. They have a
4 valuable contribution to make in my judgment and I hope we
5 can emphasize and perhaps give better support to that valuable
6 program because it does indeed contribute to safety in a very
7 direct sort of way. Examiners are very important people. I
8 hope that this whole program can stimulate our support for
9 the examiners.

10 If there are no other comments --

11 (No response.)

12 CHAIRMAN ZECH: -- thank you for an excellent
13 presentation and a job very well done. We stand adjourned.

14 (Whereupon, at 11:02 a.m., the Commission meeting
15 was adjourned.)
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CERTIFICATE OF TRANSCRIBER

This is to certify that the attached events
of a meeting of the U.S. Nuclear Regulatory Commission
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Regualification Program

TITLE OF MEETING: Public Meeting
PLACE OF MEETING: Washington, D.C.
DATE OF MEETING: October 7, 1988

were transcribed by me. I further certify that said
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JOHN TROWBRIDGE, CVR

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INTRODUCTION

o RULE REQUIREMENTS

- OPERATOR PARTICIPATION IN
CONTINUING TRAINING PROGRAMS
- FACILITY-ADMINISTERED ANNUAL OPERATING
TEST AND BIENNIAL WRITTEN EXAM
- NRC-ADMINISTERED WRITTEN AND OPERATING
TEST DURING SIX-YEAR LICENSE TERM

EARLY EFFORTS

- SAME FORMAT / TECHNIQUE AS INITIAL
LICENSING EXAMINATION
- INDUSTRY CONCERN REGARDING SAFETY IMPACT
- NRC IMPRESSED WITH SAFETY SIGNIFICANCE
- REQUAL EXAM PROGRAM TEMPORARILY SUSPENDED
WHILE NEW METHODOLOGY EXPLORED

NEW METHODS

- ASSESS EFFECTIVENESS OF
TRAINING PROGRAM
- EVALUATE OPERATOR PROFICIENCY
- CONSISTENT WITH SYSTEMATIC APPROACH
TO TRAINING AND INPO ACCREDITATION
- REDUCE IMPACT ON FACILITIES/OPERATORS
- IMPROVE NRC EXAM RELIABILITY AND VALIDITY

4

SYSTEMATIC APPROACH TO
TRAINING

- CONTENT DERIVED FROM JOB/TASK ANALYSIS
- PERFORMANCE - BASED
- FOCUS ON KNOWLEDGE/SKILLS/ABILITIES
- DYNAMIC APPROACH

OPERATING TESTS

- TWO PARTS
 - SIMULATOR
 - WALK-THROUGH
- OPTIONS FOR PLANTS
WITHOUT SIMULATORS

SIMULATOR EXAM

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- SCENARIO CONSTRUCTION
- INDIVIDUAL WEAKNESSES

WALK-THROUGH

- PERFORM TASKS IMPORTANT TO SAFETY
- FACILITY ASSISTS NRC IN TASK
IDENTIFICATION / DEVELOPMENT
- JPM's DEVELOPED FROM TASK LIST
- CONDUCTED BY FACILITY WITH
NRC OVERSIGHT

WRITTEN EXAM

- TWO PARTS
 - PLANT OPERATIONS
 - PLANT PROCEDURES
- OPEN REFERENCE

QUESTION BANK

- WRITTEN EXAM CONSTRUCTED FROM FACILITY QUESTION BANK
- NRC MAY SUBSTITUTE QUESTIONS
- NRC CONSTRUCTS EXAM
- FACILITY REVIEWS FINAL EXAM

NRC-LICENSEE COOPERATION

- COOPERATIVE EFFORT IN EXAM DEVELOPMENT
- INDEPENDENT PASS / FAIL DECISIONS
- BASIS FOR REQUAL PROGRAM EVALUATION
- NRC RETAINS FINAL AUTHORITY

REQUALIFICATION PROGRAM
SUMMARY

- PROGRAM IS ON TRACK
- POSITIVE FEEDBACK ON
PILOT EXAMS

OPTIONS FOR THE FUTURE

- NRC EVALUATES FACILITY PROGRAMS AND CONDUCTS EXAMS
- NRC DETERMINES ACCEPTABILITY OF FACILITY PROGRAMS AND FACILITY CONDUCTS EXAMS WITH NRC MONITORING
- NRC DETERMINES ACCEPTABILITY OF FACILITY PROGRAMS AND INPO/NUMARC CONDUCTS EXAMS WITH NRC MONITORING