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AUTH. NAME AUTHOR AFFILIATION

OVERBECK, G.R. Arizona Public Service Co. (formerly Arizona Nuclear Power

RECIP. NAME RECIPIENT AFFILIATION

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SUBJECT: Responds to insp repts 50-528/96-14, 50-529/96-14 & 50-530/96-14. Insp included evaluation of four applicants for senior reactor operator licenses. Three of four candidates satisfied requirements.

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TITLE: Operator Regualification Program

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Palo Verde Nuclear
Generating Station

Gregg R. Overbeck
Vice President
Nuclear Production

TEL 602/393-5148
FAX 602/393-6077

Mail Station 7602
P.O. Box 52034
Phoenix, AZ 85072-2034

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March 20, 1997

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Response to NRC Inspection Report 50-528/529/530/96-14**

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/96-14 dated December 27, 1996, concerning the administration of licensing examinations. The inspection included an evaluation of four applicants for senior reactor operator licenses. Three of the four applicants satisfied the requirements, and were issued appropriate licenses. The NRC staff noted in the inspection report coverletter that the applicants (all instructors in the operations training department) performed marginally on the written examination. In contrast, the NRC observed very good performance by the applicants in all aspects of the operating examination. In addition, the NRC staff noted that the second written pilot examination had more technical errors than observed in the first pilot examination.

Although no response is required pursuant to the provisions of 10 CFR 2.201, APS would like to acknowledge your comments. APS performed an evaluation to determine what circumstance(s) led to the marginal performance on the NRC license examination, as well as the decreased technical quality of the examination. The evaluation supported the previous conclusion that a flaw in the specification of the validation process used for the second written pilot examination was the cause of the marginal performance. Personnel performing the validation of the first written pilot examination in October 1995 included both operators and instructors who conducted the training of the class incumbents, as well as training department management personnel. Validation of the second pilot examination during this inspection (November 1996) was conducted by training department management personnel. APS has concluded that the

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technical errors identified during the post-examination review may have been minimized had operations and additional training personnel had an opportunity to validate the written examination prior to its administration, and that an improvement in the applicants' performance will coincide with an improvement in the technical quality of the examination. Therefore, in the future, management will ensure that appropriate examination reviews and validations are performed. APS appreciates the opportunity to prepare the examinations under the pilot program and believes the changes noted herein will ensure strong performance by the Palo Verde training and operations organizations.

Should you have any further questions, please contact Ms. Angela K. Krainik at (602) 393-5421.

Sincerely,

Gregg R. Overbeck

JML/AKK/KR/kr

cc: J. E. Dyer
J. W. Clifford
K. E. Johnston
K. E. Perkins
G. R. Overbeck

