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SUBJECT: Responds to Miller 890901 request re results of analysis of exam repts on implications on qualifications of staff.

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AEP:NRG:0992A

Donald C. Cook Nuclear Plant Units 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
NRC EXAMINATION REPORT NO. 50-315/OL-89-01  
AND 50-316/OL-89-01

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Attn: A. B. Davis

October 2, 1989

Dear Mr. Davis:

This letter is the Cook Nuclear Plant response to the request contained in Mr. Miller's letter dated September 1, 1989 which forwarded the subject examination report for the NRC examinations administered on July 10-19, 1989. The specific request was for Cook Nuclear Plant to present the results of our analysis of the examination results including any implications this may have on the qualifications of our incumbent operating staff. The plant was also requested to discuss our strategy to prevent a recurrence of the high failure rate.

The content of the Cook Nuclear Plant Operator Replacement Program was originally developed based on reactor operator and senior reactor operator tasks selected as training subjects by Subject Matter Experts (SME's) during the first round of INPO accreditation in 1986. During May of 1987 these tasks were revalidated and tasks for which site specific simulator training was to be conducted were selected. Tasks selected as subjects of simulator training were then used as the basis for developing our seven-week simulator course for reactor operator and senior reactor operator candidates. Since the administration of the NRC Operating Examination in July, this matrix has once again been validated in accordance with our ongoing accreditation process. From these processes, we have concluded that the content of the simulator training program is sound, however we will continue to fine tune the program.

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Our internal evaluation mechanisms identified three of the weaknesses cited in your examination report: instructors served as evaluators thereby limiting objectivity; individual weaknesses were not compared to determine possible programmatic weaknesses thereby overlooking a generic weakness in procedure usage; and Instant SRO candidates were not routinely evaluated as control board operators. Additionally, we concur with your examination report finding which stated that our evaluation scenarios did not expose the candidates to the same conditions as an NRC examination would require.

In essence, we agree with the results of the NRC examination report. While we also believe that the program can be improved the existing program has demonstrated sufficient success to provide confidence in the qualifications of the incumbent operating staff. All operators licensed as a result of this examination have been enrolled in the operator requalification program which continuously exercises Emergency Operating Procedure Response Not Obtained and Emergency Operating Procedure contingency actions. We believe that three of the scenarios developed for this examination were inappropriately constructed to test these concepts. NUREG 1021 ES 301 discourages the use of unrelated major casualties such as the following:

1. Steam generator tube rupture at 60 gpm  
Loss of 600V buss 21A  
Reactor coolant system hot leg rupture
2. Refueling water storage tank rupture to 45%  
Auxiliary feed water suction leak  
Reactor coolant system cold leg rupture
3. Pressurizer power operated relief valve leak  
Loss of control air inside containment  
Steam generator tube rupture at 550 gpm

It is our position that Emergency Operating Procedure contingency actions can be exercised without the use of unrelated and unrealistic scenario sets. However, we will ensure that our operators are challenged with sufficiently difficult scenarios to engender high confidence in their ability to deal with all reasonable contingencies.

Our strategy to deal with the identified program weaknesses and to prevent the recurrence of a high failure rate in the future is outlined below.

1. At least two simulator floor evaluators will be used during evaluation scenarios. Every effort will be made to ensure that at least one of these evaluators is not the instructor

for the week's simulator training. Additionally, evaluators from the Operations Department will be used as personnel are available. This improvement has already been implemented into our present Replacement Class.

2. Evaluation scenarios will be revised to routinely exercise cautions/notes and include emergency contingency actions. For the short term, revised versions of the NRC examination scenarios will be used in our programs. Long term research such as that suggested in the examination report will be required in order for us to develop our own scenarios. The vendor contracted to provide our next audit examination has been directed to develop scenarios that examine to the standards stated above.
3. Our simulator program will be revised to ensure that Instant SRO's are evaluated as reactor operators in a more appropriate manner. This program revision will be in place no later than the start of the next Instant SRO Simulator Class.
4. Existing simulator scenarios have been revised to require the licensed candidates to review all instructor comments from the previous week's simulator training. These comments are not typically completed at the time of the actual debriefing and contain observations that could potentially be overlooked during the actual debriefing. It is intended that this review by the candidates will refresh lessons learned from prior simulator sessions and identify trends that can be addressed by them as a group prior to the start of the next week of simulator training. These daily comment sheets are reviewed by the program administrator at the end of each week, with individual and team weaknesses summarized. The program administrator will also review all individual weaknesses identified during simulator evaluations to determine possible generic weaknesses for the group. In addition, an independent review of simulator evaluations is periodically performed by the Training Support Section of the Training Department. This independent review will also be used to identify generic weaknesses.

Additionally, an independent audit organization experienced in licensed operator training and evaluation has been contracted to review the content of our SRO Simulator Training Program. The results of this review will be incorporated into the simulator program as appropriate. These results will be forwarded to you upon request.

Mr. A. B. Davis

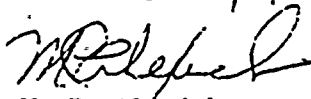
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AEP:NRC:0992A

In conclusion, our analysis of the examination results indicates that the qualifications of our incumbent operating staff are not impacted. We have also enhanced our program to reduce the possibility of such a high failure rate.

This document has been prepared following Corporate procedures that incorporate a reasonable set of controls to ensure its accuracy and completeness prior to signature by the undersigned.

Sincerely,



M. P. Alexich  
Vice President

eh

cc: D. H. Williams, Jr.  
A. A. Blind - Bridgman  
R. C. Callen  
G. Charnoff  
NFEM Section Chief  
NRC Resident Inspector - Bridgman

1/25/2000

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REQUALIFICATION PROGRAM INSPECTION

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IE42 - Operator Licensing Examination Reports

Docket: 05000315

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Docket: 05000316

January 25, 2000

Mr. R. P. Powers  
Senior Vice President  
Nuclear Generation Group  
American Electric Power Company  
500 Circle Drive  
Buchanan, MI 49107-1395

SUBJECT: REQUALIFICATION PROGRAM INSPECTION

Dear Mr. Powers:

In a telephone conversation on January 19, 2000, Mrs. A.M. Stone, Senior Operations Engineer, and Mr. R.G. Brown, Licensed Operator Requalification Training Supervisor, made arrangements for the NRC to inspect the licensed operator requalification program at the D. C. Cook Nuclear Power Plant. An inspection is planned for the week of February 14, 2000, which coincides with your scheduled requalification written examination. The staff at your facility should prepare and conduct the requalification examinations in accordance with your NRC-approved requalification program.

We understand that you will be conducting your annual operating tests after the start-up of Unit 2. Please notify Mrs. Stone promptly when the dates for the operating tests are finalized so that we may schedule our inspection accordingly.

The materials which will be reviewed by the inspectors during the week of February 14 were discussed with Mr. Brown. Thank you for your cooperation in this matter. If you have any questions regarding this inspection, please contact Ann Marie Stone at 630-829-9729, or me at 630-829-9733.

Sincerely,



David E. Hills, Chief  
Operations Branch

Docket Nos. 50-315; 50-316  
License Nos. DPR-58; DPR-74

See Attached Distribution

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