



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

September 11, 2018

EA-18-061

Mr. Bryan C. Hanson
Senior Vice President, Exelon Generation Company, LLC
President and Chief Nuclear Officer (CNO), Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: CALVERT CLIFFS NUCLEAR POWER PLANT – NRC INVESTIGATION NO.
1-2017-016

Dear Mr. Hanson:

This letter refers to an investigation by the U.S. Nuclear Regulatory Commission (NRC) Office of Investigations (OI) conducted at Exelon Generation Company, LLC's (Exelon's) Calvert Cliffs Nuclear Power Plant (Calvert Cliffs). The investigation, which was completed on May 17, 2018, was conducted to determine whether an instructor for the Calvert Cliffs non-licensed operator (NLO) training program caused Exelon to be in violation of NRC requirements by providing examination review sessions that could have compromised the subsequent exams. As described below, the NRC determined that the circumstances of the case did not result in a violation of NRC requirements. Consequently, the NRC is not taking enforcement action against Exelon.

The subject instructor, who no longer works at Calvert Cliffs, testified to OI that Exelon did not have a procedure describing how to conduct exam reviews and did not require that instructors provide them. However, to help the students know what they needed to study, the instructor prepared reviews by looking at the exams and changing the questions (e.g., referencing different components). The instructor stated that this would prevent the students from spending time studying material that wouldn't be on the exam. OI identified that two such reviews prepared by the instructor contained some questions and answers (Qs/As) that exactly mirrored Qs/As on the corresponding exam and many others that only slightly differed from the exam Qs/As (e.g., using the term "raised" instead of "increased"). In response to the OI investigation, Exelon initiated its own review of the issue and identified six other examples of NLO exam review materials prepared by the instructor that the licensee concluded inappropriately incorporated exam questions.

As indicated in Title 10 of the Code of Federal Regulations (10 CFR) 50.120, the NRC requires licensees to implement a training program that, in part, ensures NLOs have the necessary knowledge, skills, and abilities to perform their assigned jobs competently (i.e., they are qualified to independently perform specific activities). Accordingly, under Exelon's program, an NLO's qualifications are based on a combination of multiple written exams and performance evaluations (e.g., job performance measures, on the job training/task performance evaluation). After considering the evidence obtained through the investigation, the NRC staff determined that the instructor's actions did not impact the overall effectiveness of the NLO training program at Calvert Cliffs. Specifically, the instructor's actions related to exams for individual classes that

comprised only a portion of the larger NLO training program. Additionally, the NRC investigation did not find evidence that the instructor assisted students during the performance of exams or gave them actual answer sheets to allow the students to avoid learning the actual subject matter in preparation for the exams. Furthermore, there was no evidence of actual performance gaps by NLOs that would be attributed to this issue or indicated a training program weakness. The NRC concluded that since the actions of the individual instructor did not impact the effectiveness of Exelon's program for training NLOs, that this case did not involve a violation of NRC requirements.

You are not required to respond to this letter. However, should you choose to respond, your response should be sent to the U.S. Nuclear Regulatory Commission, ATTN: Regional Administrator, Region I, 2100 Renaissance Boulevard, King of Prussia, PA 19406, and marked "Open by Addressee Only," within 30 days of the date of this letter, with a copy to the NRC Senior Resident Inspector at Calvert Cliffs. In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, and your response, if you choose to submit one, will be available electronically for public inspection in the NRC Public Document Room and from the NRC's Agency-wide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html/>.

Please note that final NRC investigation documents, such as the OI report described above, may be made available to the public under the Freedom of Information Act (FOIA), subject to redaction of certain information appropriate under the FOIA. Requests under the FOIA should be made in accordance with 10 CFR 9.23, Requests for Records. Additional information is available on the NRC website at <http://www.nrc.gov/reading-rm/foia/foia-privacy.html>.

Should you have any questions concerning this letter, please contact Ms. Marjorie McLaughlin at 610-337-5240.

Sincerely,

/RA/

Raymond K. Lorson, Director
Division of Reactor Projects

Docket Nos. 50-317 and 50-318
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1-2017-016 DATED SEPTEMBER 11, 2018

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