

POINT BEACH NUCLEAR PLANT

WISCONSIN ELECTRIC POWER COMPANY

Route 3, Box 48, Two Rivers, Wisconsin 54241

May 10, 1978

Mr. Paul F. Collins, Chief
Operator Licensing Branch
Division of Project Management
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Collins:

DOCKET NOS. 50-266 AND 50-301

This letter is in reply to your letter of April 13, 1978, concerning the administration of the Licensed Operator Re-qualification Program at Point Beach Nuclear Plant.

In accordance with our telephone conversations with you on April 20 and 21, 1978, nine examinations were regraded by the Training Supervisor, the Operations Superintendent, and me. The exams regraded were the three which were audited by your staff, the other three with the lowest averages, and the three with the highest averages. The results of the regrading are attached, including your Mr. Mahan's results, where applicable, for comparison.

The check grading was first performed by our present Operations Superintendent, who formerly administered the Point Beach Nuclear Plant on-site training program. The second check grading was performed by me personally. My qualifications include former SRO license status and former principal instructor for Yankee Rowe training schools in the area of atomic physics and nuclear engineering, nuclear plant systems design, and nuclear plant operating procedures. The Operations Superintendent and I agreed very closely (within a few percent) on the check grading.

I am certain you will agree that it is unlikely that any two graders of essay-type examinations will exactly agree on a grade. Based upon this audit incident, I must also conclude that in a "small university" environment where there is a close relationship, almost on a private tutor basis, between instructor

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and student, an instructor can get to know, and be sensitive to, the proficiency of the student. Additionally, action-oriented operating personnel tend to use terse answers. In my experience of instructing and grading student work in the past, I have seen excellent operating personnel who could clip a response that some might consider to require a sentence to the level of a single word.

Finally, our people in a retraining examination have no doubt fallen into the habit of writing their answers for their close associate instructor with the least burden to themselves compared to the writing of answers for NRC examiners or outside reviewers. Our licensees have not been clearly informed that the written examination papers in the retraining program would be subject to close audit by others not familiar with their writing style or knowledge. After this incident, I would expect a change in writing style and precision.

The following specific points stand out from our review of this audit incident and the attached summary sheets:

1. The Training Supervisor hardened his grading in going from his "original" to "regrade". This hardening resulted for the three audited persons in a reduction in overall average grades of 1.9%, 1.2%, and 4.6%. These changes seem to me to fall within an allowable variation for grading of essay-type examinations.
2. The Operations Superintendent and my own regrade of the three examinations audited by your staff fall very close to the Training Supervisor regrade with overall average differences of 2.7%, 0%, and 0.3%. These are also within 5% of the original grade given by the Training Supervisor.
3. The NRC examiner's (Mr. Mahan) grading is substantially different in some categories from the grading by our Training Supervisor, and from our regrading. In one or two categories, this reaches about a 25% point difference; yet, in other categories, the difference is negligible.

The basic issue, in our view, is why is there a wide difference between Mr. Mahan's grading and the grading performed by Point Beach Nuclear Plant personnel. It might be because a "cookbook" answer in accordance with the answer key is not necessarily the only correct answer. The answer key which Mr.

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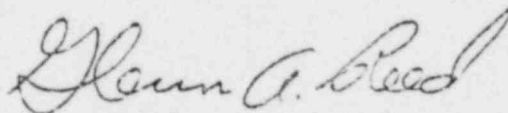
Mahan may have used in his evaluation was written by the Training Supervisor for the Training Supervisor's use only as a guide and abbreviated reference when grading the exams. If an answer given was not exactly what the Training Supervisor was looking for, but still a correct answer, then partial credit was given. When 28 different individuals answer an essay-type question, you will probably receive a variation of 28 different answers, none of them exactly like the abbreviated answer key.

In the case of Mr. T. Suttner's exam, is it possible that Mr. Mahan did not realize he was grading an RO exam or did not understand how an RO was graded when answering SRO questions? If an RO attempts to answer an SRO question, the point value for that question is added to the total point value for that section. If the RO then incorrectly answers the question, only one half the normal points will be subtracted. Items like these which could have led to differences in grading scores might have been eliminated by some discussion between Mr. Mahan and the Training Supervisor.

Based upon the results of the regrading by Point Beach Nuclear Plant personnel and the fact that little difference was found, the Training Supervisor's regrade scores will be used as our record and the retraining program will be administered in accordance with those grades.

In respect to these specific examination results, those personnel receiving a score of less than 80% in a given category will attend the training scheduled for that category; Mr. Greenwood will receive extra training in addition to the requirements of the retraining program since his scores are marginal; and a copy of final examinations administered to Mr. Greenwood, including the answer key, will be sent to you when the training is completed.

Very truly yours,



Glenn A. Reed

Manager - Nuclear Power Division

Attachments

<u>F. Suttner (RO)</u>	NRC AUDITOR MAHAN	TRNG SUPVR ORIGINAL	TRNG SUPVR REGRADE	OPS SUPT & MANAGER REGRADE
Theory & Principles of Operation	54%	82%	79%	77.4%
General & Specific Operating Characteristics	73%	85%	83%	79.6%
Instrumentation and Controls	54%	58%	55%	55.8%
Plant Protection Systems	81%	86%	82%	81.8%
Engineered Safety Systems	90%	90%	92%	91.6%
Normal, Abnormal and Emergency Procedures	75%	85%	85%	68.3%
Technical Specifications	76%	80%	75%	76.7%
Radiation Control & Safety	80%	98%	96%	94.6%
Title 10, Chapter I, CFR	88%	88%	88%	85.3%
AVERAGE	74.6	83.6%	81.7%	79

<u>J. Greenwood (SRO)</u>	NRC AUDITOR MAHAN	TRNG SUPVR ORIGINAL	TRNG SUPVR REGRADE	OPS SUPT & MANAGER REGRADE
Theory & Principles of Operation	32%	68%	53%	53.5%
General & Specific Operating Characteristics	43%	59%	59%	57.7%
Instrumentation and Controls	45%	51%	49%	55%
Plant Protection Systems	84%	84%	84%	84%
Engineered Safety Systems	41%	62%	62%	64.7%
Normal, Abnormal and Emergency Procedures	64%	64%	72%	58.3%
Technical Specifications	53%	68%	66%	72%
Radiation Control & Safety	97%	97%	97%	97%
Title 10, Chapter I, CFR	59%	94%	94%	94%
AVERAGE	57.5%	71.9%	70.7%	70.7%

<u>D. Seavers (SRO)</u>	NRC AUDITOR MAHAN	TRNG SUPVR ORIGINAL	TRNG SUPVR REGRADE	OPS SUPT & MANAGER REGRADE
Theory & Principles of Operation	85%	97%	90%	87%
General & Specific Operating Characteristics	87%	90%	84%	88.7%
Instrumentation and Controls	62%	64%	61%	60.1%
Plant Protection Systems	61%	86%	77%	68.1%
Engineered Safety Systems	38%	50%	41%	55.9%
Normal, Abnormal and Emergency Procedures	73%	78%	73%	65.7%
Technical Specifications	72%	76%	74%	67.6%
Radiation Control & Safety	80%	93.3%	93.3%	92.2%
Title 10, Chapter I, CFR	88%	88%	88%	88%
AVERAGE	71.8%	79.7%	75.1%	74.8%

THREE LICENSED PERSONNEL RECEIVING HIGHER GRADES

	NRC AUDITOR MAHAN	TRNG SUPVR ORIGINAL	TRNG SUPVR REGRADE	OPS SUPT & MANAGER REGRADE
Theory & Principles of Operation	N/A	90%	90%	74.2%
General & Specific Operating Characteristics		85%	83%	88%
Instrumentation and Controls		86%	81%	79%
Plant Protection Systems		95%	93%	93.2%
Engineered Safety Systems		93%	93%	93.3%
Normal, Abnormal and Emergency Procedures		86%	89%	86.2%
Technical Specifications		85%	85%	91.2%
Radiation Control & Safety		95%	95%	96.4%
Title 10, Chapter I, CFR		100%	100%	100%
AVERAGE	Y	90.6%	90.1%	89.1%

	NRC AUDITOR MAHAN	TRNG SUPVR ORIGINAL	TRNG SUPVR REGRADE	OPS SUPT & MANAGER REGRADE
Theory & Principles of Operation	N/A	73%	73%	67.7%
General & Specific Operating Characteristics		89%	84%	83.9%
Instrumentation and Controls		88%	86%	85.6%
Plant Protection Systems		98%	93%	97.7%
Engineered Safety Systems		88%	88%	94.1%
Normal, Abnormal and Emergency Procedures		83%	83%	83.2%
Technical Specifications		97%	97%	94.1%
Radiation Control & Safety		95%	92%	94.8%
Title 10, Chapter I, CFR		100%	100%	100%
AVERAGE	Y	90.1%	89%	89%

	NRC AUDITOR MAHAN	TRNG SUPVR ORIGINAL	TRNG SUPVR REGRADE	OPS SUPT & MANAGER REGRADE
Theory & Principles of Operation	N/A	97%	97%	96.8%
General & Specific Operating Characteristics		84%	77%	82.8%
Instrumentation and Controls		83%	79%	79%
Plant Protection Systems		84%	84%	79.5%
Engineered Safety Systems		91%	91%	80%
Normal, Abnormal and Emergency Procedures		88%	88%	
Technical Specifications		97%	94%	
Radiation Control & Safety		95%	93%	
Title 10, Chapter I, CFR		94%	94%	

	NRC AUDITOR MAHAN	TRNG SUPVR ORIGINAL	TRNG SUPVR REGRADE	OPS SUPT & MANAGER REGRADE
Theory & Principles of Operation	N/A	65%	53%	45.7%
General & Specific Operating Characteristics		75%	71%	71%
Instrumentation and Controls		65%	62%	62.4%
Plant Protection Systems		91%	91%	90.9%
Engineered Safety Systems		76%	75%	75%
Normal, Abnormal and Emergency Procedures		66%	63%	60.4%
Technical Specifications		93%	93%	91.2%
Radiation Control & Safety		85%	85%	82.2%
Title 10, Chapter I, CFR		94%	94%	94.1%
AVERAGE	✓	78.9%	76.3%	74.9%

	NRC AUDITOR MAHAN	TRNG SUPVR ORIGINAL	TRNG SUPVR REGRADE	OPS SUPT & MANAGER REGRADE
Theory & Principles of Operation	N/A	90%	87%	80.6%
General & Specific Operating Characteristics		84%	83%	80.3%
Instrumentation and Controls		70%	68%	72.5%
Plant Protection Systems		70%	68%	68.2%
Engineered Safety Systems		71%	72%	72%
Normal, Abnormal and Emergency Procedures		58%	58%	58%
Technical Specifications		62%	62%	64.7%
Radiation Control & Safety		94%	91%	93%
Title 10, Chapter I, CFR		82%	82%	82%
AVERAGE	✓	75.7%	74.6%	74.6%

	NRC AUDITOR MAHAN	TRNG SUPVR ORIGINAL	TRNG SUPVR REGRADE	OPS SUPT & MANAGER REGRADE
Theory & Principles of Operation	N/A	84%	84%	72.6%
General & Specific Operating Characteristics		91%	88%	90.7%
Instrumentation and Controls		65%	60%	64.6%
Plant Protection Systems		57%	57%	57%
Engineered Safety Systems		88%	88%	88%
Normal, Abnormal and Emergency Procedures		70%	67%	77.3%
Technical Specifications		77%	70%	73.6%
Radiation Control & Safety		87%	87%	85.7%
Title 10, Chapter I, CFR		53%	53%	53%
AVERAGE	✓	74.7%	72.7%	74.2%