

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
METROPOLITAN EDISON COMPANY)	Docket No. 50-289 SP
)	(Restart)
(Three Mile Island Nuclear)	
Station, Unit No. 1))	

LICENSEE'S TESTIMONY OF

HENRY D. HUKILL

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I. Nature of Testimony

My name is Henry D. Hukill. I am the Vice President of Three Mile Island, Unit 1, the most senior member of GPU Nuclear Corporation's management with responsibility solely for TMI-1. I testified at length earlier in the TMI-1 restart proceeding, and my responsibilities and professional qualifications are described in the Partial Initial Decision (PID) of August 27, 1981 at §§ 148-151 and 71, respectively.

My testimony today covers a number of the issues identified in the joint statement of issues prepared by the parties to this reopened hearing, as modified by the Licensing Board during the October 2, 1981 prehearing conference. First, I will discuss the extent of Licensee's management knowledge of, encouragement of, negligent failure to prevent and/or involvement in cheating in NRC or Company administered exams, from my perspective as the Vice President of TMI-1. Next, I will discuss my participation in the NRC investigations of cheating and rumors of cheating on the April, 1981 NRC exams. Third, I will focus upon my own investigations and response to cheating on NRC and Company exams. I will then review the adequacy of projected staffing of TMI-1 operations, and the TMI-1 operator certification process.

II. Prior Knowledge of Cheating

The first indication I had that there was a possibility of cheating on the NRC exams given in April of this year occurred at approximately 5:30 p.m., Monday, July 27. At that

time, I received a call from Mr. Arnold, who requested that I meet him at the office of Mr. Lake Barrett, the Deputy Director of the NRC's TMI-2 Program Office, to discuss a very important matter. I proceeded to Mr. Barrett's office and met with Mr. Arnold, Mr. Barrett and several of the investigators from the Office of Inspection and Enforcement (I&E). Mr. Arnold and I were shown and requested to review two of our SRO license candidates' (O and W) examinations. Together, we reviewed portions of the suspect exams, shown to us by the inspectors. At that time, it was apparent to us that there may have been collusion between operators O and W on the exams.

Prior to that time, I had absolutely no knowledge or indication of any kind that cheating could have occurred or did occur on the NRC exams, or on any other licensed operator exam. I was totally caught by surprise and shocked when I saw the two exams which contained virtually identical answers, particularly in view of my personal association with individuals O and W and my familiarity with their reputations as highly competent senior reactor operators and as supervisors. Even today, knowing that both of these individuals have admitted to cheating on the NRC exams, I find it difficult to understand although I clearly recognize the fact that such conduct did occur.

In retrospect, I feel somewhat naive and, in view of my position as the senior member of management at TMI-1, responsible for the cheating which has occurred. Needless to

say, I have given this issue a tremendous amount of thought in the past three months or so. I would like to briefly share my perspective on the specific subject of cheating on NRC exams, and generally, on the issue of honesty in the conduct of one's job as an employee at a nuclear power plant.

As a graduate of the United States Naval Academy who served on active duty in the Navy for more than 22 years, most of which was associated with nuclear power and submarines, ingrained in me is an understanding of the absolute need for total honesty and trustworthiness on the part of all individuals, from the top to the bottom, in an organization, and the strong belief that cheating, lying, falsification of records, or any other conduct which reflects a willingness to compromise the integrity of one's actions is totally unacceptable and cannot be tolerated. In the environment I have worked and lived in such actions on the part of any individual could endanger the ship, its equipment and, in fact, the lives of those for whom I was responsible. I cannot recall whether at the Naval Academy we were told point-blank that any form of cheating was unacceptable; however, I can say that it was clear to me from the day I entered the Academy that I was being trained to be an officer in the United States Navy, and that one certainly could be automatically dismissed from school for such an offense.

This principle -- that false representations are intolerable -- was inherent in my submarine experience, where

the lives of the individuals in the submarine are dependent on each person's honesty in his work. For example, when we "rigged for dive", i.e., prepared to submerge, two individuals would go through the submarine and open or close appropriate hatches, valves, etc., necessary to safely submerge. These two individuals signed a paper indicating that they had properly completed their assigned task. The safety of the entire ship and the lives of the crew depended on their honesty and integrity.

When I went to naval nuclear school, it was clear to me that the work that was being judged was expected to be my own. Cheating was simply out of the question. Again, perhaps I was naive; but it was always clear to me that cheating was unacceptable, and that it was dishonorable.

As a commanding officer for five years, I considered falsifying records or any form of dishonesty as the most serious offense, less those of a capital nature, which one of my men could engage in. Later in my experience while working in Admiral Rickover's office, this principle was emphasized by the Admiral in every detail of one's daily work: we were expected to carry out every facet of every assignment with absolute, professional integrity and honesty, regardless of the significance of the assignment or the expected outcome or results.

In summary, I arrived at TMI-1 with an attitude about my job which had been formulated from my Navy experience.

While it may have been a failing on my part not to expressly communicate this integral part of my past experience with all members of the TMI-1 staff when I arrived, and to assume that such a viewpoint about honesty was common-place, it was certainly not a conscious ignorance on my part of a principle I believe is critical to maintaining integrity in one's work, particularly when the health and safety of the public is entrusted to them as operators of a nuclear power plant. As discussed below, I intend to make my views on this subject clearly understood by my staff, and have begun this process over the past several months. I do believe that I and my managers can make it absolutely clear to our personnel why honesty is absolutely necessary and required, and ingrain in them the correctness of this philosophy which, in most cases, I believe merely will be confirmatory of the values held by the personnel at TMI. In stating this, I must observe that I have read Mr. Arnold's prefiled written testimony in this proceeding, and share the philosophy that he candidly discusses there. I recognize that there is an ideal world for which I strive and expect my people to strive, but that in application, ideals are not always realized and shortcomings in this regard must be recognized and dealt with fairly.

III. Potential Constraints on NRC Investigation

During the NRC's investigation of cheating by individuals O and W on the April, 1981 NRC exams, and on portions of the follow-up investigations conducted by NRC's I&E personnel, I attended some of the interviews of Operations staff conducted by the NRC investigators. In addition, Mr. Paul G. Christman, Manager, Plant Administration at TMI-1, attended a few interviews of licensed operators conducted by I&E. To the best of my recollection, I did not interject my views into the interview process. I would estimate that in total, I probably only said 10 or 15 words, in response to questions. Mr. Christman has informed me that this his experience was comparable, and that he did not interject his views during the interviews he attended.

To the best of my knowledge, Mr. Christman and I never discussed the issue of cheating with individuals identified by the NRC investigators as persons with whom they sought interviews prior to the conduct of these interviews. It was not our intention or desire to interfere in the NRC's investigations or to in any way constrain the conversations which did take place between members of my staff and the NRC investigators. Rather, Mr. Christman and I sat in on the interviews as GPU Nuclear management representatives at the request of the interviewees, who were each informed of their entitlement to have us present, if they so chose. I did feel, however, that it would be beneficial for me to attend, if the

interviewee requested our presence, since it would enhance the individual's cooperation and confidence. Also, by attending, I would gain first-hand knowledge of the scope of the problem with which I was faced as Vice President of TMI-1.

Senior management participation in the NRC investigation of cheating included my attendance or Mr. Christman's attendance at the following specific interviews:

(1) On July 27, with the agreement of Mr. Victor Stello, the Director of the Office of Inspection & Enforcement, Mr. Christman and I attended the interviews of operators O and W conducted by I&E investigators. We attended these meetings after the interviewees were asked by the NRC staff whether they desired our attendance during the interviews. Just prior to these interviews, I had individually informed O and W that a member of senior management, either Mr. Christman or myself, was available and willing to sit in on their interviews if they specifically requested. Both individuals indicated their desire to have us present during the interviews. At no time did I insist my presence (or Mr. Christman's) was required or preferred, nor do I believe that our presence was desired for reasons other than providing emotional support to the suspect individuals. During these interviews, the issue of cheating was raised with O and W, both of whom denied any wrongdoing.

Because the interviews with O and W were conducted simultaneously, Mr. Christman attended individual O's interview; I attended individual W's interview.

(2) Mr. Christman and I attended the follow-up interviews of O and W conducted by I&E investigators on July 30, also simultaneously given. Our attendance was again prompted by the requests of O and W to have us present. At these interviews, O made modifications to a statement prepared by the investigators of the substance of his prior interview on July 27. Individuals O and W did not agree to sign the statements prepared by the investigators of their prior interviews until they obtained advice of counsel, who were not present.

(3) Mr. Christman and I accompanied O and W to Bethesda, Maryland for their respective meetings with Mr. Stello. Neither Mr. Christman nor I attended those meetings. Mr. Stello did give me a written copy of O and W's statements concerning their cheating on the April 1980 examinations.

(4) I also attended the following interviews conducted by I&E investigators at the request of each individual: on July 28, individuals EE and A; on July 29, individuals U, S, R, H, OO and Q. Mr. Christman attended the interview of individual DD at DD's request. Each of these individuals was told prior to the interview that he could have a member of senior management or any other individual he chose present during the interview if he so desired. Each individual expressed to me (or to Mr. Christman, in the case of individual DD,) and to the investigators that he would like us to be present.

It is y understanding that sometime after July 30, Mr. Stello changed his mind with regard to allowing senior management to be present during the investigation interviews, and so informed Mr. Arnold. From that point on, a representative from senior management did not attend NRC's numerous follow-up interviews of TMI-1 employees.

In conclusion, I do not feel that my presence during the interviews I attended constrained the NRC's investigation of cheating in any way, nor do I believe Mr. Christman's presence on several occasions had that result. Moreover, given the fact that the I&E investigators subsequently interviewed whomever they chose to talk with without senior management from the Company present, including re-interviewing individuals as they found necessary, I see no basis for concluding that Licensee management constrained NRC's investigation of cheating and rumors of cheating in licensed operator examinations.

IV. Management Response to Cheating

Perhaps the best way for me to describe management's actions, and particularly my actions, since the discovery of cheating on the April, 1981 NRC examinations is to chronologically review the meetings I have either attended or conducted with the individuals, specifically the operators who work for me, who took the NRC exams last April. Let me preface that review with the fact that this past summer, before the discovery of cheating on operator examinations, I talked with the

entire plant staff of more than 300 individuals in groups of five to ten individuals, for one to two hours, in order to emphasize to them the issues of importance to me which we faced as TMI-1 personnel, to get to know them as individuals and vice versa, and to discuss with them the problems which were on their minds. My focus, as a relative newcomer to the island, was to instill in them pride in the organization and an understanding that TMI-1 is a place where people should like to work and should excel in their work. I also wanted to ensure they understood my philosophy regarding the absolute need for professionalism in carrying out their duties.

During the first week of August, shortly after the discovery of cheating on the NRC exams, Mr. Arnold convened a meeting with all of the available licensed operators, myself, Mr. Toole, the Director of Plant Operations and Maintenance, and Mr. Ross, the Manager of Plant Operations. During this meeting, which lasted approximately one and a half hours, Mr. Arnold addressed the group on the importance he placed on maintaining our integrity as individuals and as a corporation. He stated that cheating was intolerable, and emphasized the tremendous responsibility placed on us as operators and managers of a nuclear power plant. I did not speak during this meeting.

Over the course of the next few weeks, I met with each of the licensed operators by shift for approximately one to two hours. The meetings took place in the plant. During

these meetings, I reviewed the following subjects with each group: (1) the facts related to cheating, as I understood them at that time; (2) actions which I would not tolerate, including cheating, and intentionally falsifying records; (3) why the Company had undertaken to rapidly resolve the O and W cheating incident; that is, because O and W's actions were unacceptable, delaying the matter would only increase O and W's anxieties and the potential consequences to them of their misconduct, and it was bad for morale generally to delay taking prompt action with regard to personnel problems; (4) that I did not believe that the management of GPU Nuclear had improperly treated O and W in view of their conduct, although I was concerned with the more complex problem of the degree to which O and W felt "driven" to cheat, and I felt responsible for not ensuring that individuals felt ready (substantively and emotionally) to take the exams, for ensuring proper administration of our own examinations, and for having no rules on cheating; (5) reaffirmation of my intention to utilize six shifts, although I anticipated that a five shift rotation temporarily might be necessary depending on the timing of TMI-1 restart; and (6) requested feedback from the group on my comments.

On the basis of the feedback which I received at these meetings, I first became sensitized to the degree of the morale problem with the operators, and of a need to change their attitude with respect to the importance of the examination process. My awareness of this problem was reinforced in a

follow-up meeting convened by Mr. Arnold at which most of the operators were in attendance. The operators did not feel that the written examinations alone were an adequate measure of their abilities, and were frustrated and angry with the need for them to repeatedly take the NRC exams, when other operators around the country were not subject to this requirement, nor did they cheat on the April, 1981 exam. It was at this juncture that it became clear to me that I and others in management positions in the Company needed to make it clear to the operators that while the NRC licensed operator examinations and our mock exams were not the only gauge of an operator's capabilities, they were indeed an objective measure of an operator's knowledge. In conjunction with their overall performance in training, on the job, and on the oral examinations, the written exams were a measure of their qualification and ability to perform as licensed operators. Moreover, regardless of their opinion of the written exams they were required to take, I placed significance on them, and would not tolerate misconduct in taking these exams or, for that matter, in their participation in the training and testing program which the Training & Education Department has developed for their benefit.

During my subsequent normal bi-monthly managers meetings, I strongly emphasized the information I had relayed to the licensed operators. Attending the managers meetings were the TMI-1 Managers, as well as onsite managers from GPU

Nuclear's support groups, such as the Manager of Quality Assurance, Mr. Blaine Ballard, the Manager of Training, Dr. Ronald A. Knief, the Manager of Radiological and Environmental Controls, Mr. William Potts, and others.

During the weeks of October 5 and 12, I also met individually with every TMI-1 licensed operator candidate on the plant staff who took the NRC examinations in April. At these meetings, I focused on a number of subjects. The first subject was a letter sent by Mr. Arnold to all GPU Nuclear employees which emphasized the importance of regulations in our business, and the commitment of management to not only the law expressed in the regulation, but the intent of that requirement. I also discussed with them a letter I had sent to each of them individually, a sample copy of which is attached. This letter, sent to all TMI-1 operators and management personnel, emphasized the fact that their obligation to follow NRC's requirements was based on the concern for safety. Almost without exception, I would require my staff to adhere to these or similar requirements even if there were no NRC regulations on the subjects. I informed each individual that the Company expected them to be straightforward and honest and relied upon their being truthful if the individual was interviewed by an individual from one of our regulatory agencies, or if they were called to testify in the restart hearings. I also reemphasized my view that the NRC written exams provide a means by which the NRC and plant management can ensure and verify that operators

have a certain minimum knowledge level. Finally, I reviewed with each candidate his personal responsibility as a licensed operator, for the health and safety of the public, and in carrying out this responsibility, the absolute need to pay close attention to his duties in operating the plant strictly in accordance with established rules, regulations and procedures. I was totally satisfied that each and every operator understood and would carry out fully this responsibility.

During these individual interviews, which generally lasted from one to two hours, I asked each individual whether he had cheated on the NRC, Kelly, ATT's and Category T exams, and whether he knew of anyone who had cheated on these exams. With one exception, the answer given by each individual to both of these questions was "no". The exception was the response by individual FF to the second question, namely, whether he knew of anyone who had cheated on an exam.

FF informed me that when he had gone out of the room in which he was taking the NRC's April, 1981 exam for a cup of coffee, an individual from the other exam classroom asked him a question which he answered. FF then went back into the classroom where he was taking the exam. FF was not able to recall the individual's name or the question.

While FF's conduct raised questions in my mind about his judgment, including his capability to respond properly to unexpected events, it was my judgment, based on a number of conversations I have had with him and other management

personnel, that he should be severely reprimanded, but not removed from his assigned duties. The factors that went into my decision included the fact that FF had volunteered this information to me, that the instance did not involve a planned decision to cheat on his part but rather was a spontaneous action, that it was an isolated instance, that FF admitted to me that his answering this question was wrong and unacceptable, that I do not believe FF will repeat this action, and that FF has shown over a seven year period of time a high degree of competence and honesty on the job. Certainly, misconduct by my staff must be effectively responded to by me; however, I do not believe that the proper response in all cases is to terminate an individual's employment with the company. In my view, the action we have taken makes clear to FF and to others who may know of it that answering a question which may be on an exam while the exam is being conducted is highly improper conduct which should under no circumstances take place. In my view, for management to make this position clear did not require more severe action in this particular instance.

In summary, I have made every effort to personally discuss with the TMI-1 operations staff and management, from Mr. Toole down through the organization, the standards of conduct which I expect and which I will demand from them. To remove any lingering doubts, these policies are being formalized now within GPU Nuclear. I believe that the most important contribution I can make to preserving the integrity

of our operators and of GPU Nuclear, generally, is (i) to ensure that procedures and regulatory requirements are followed; (ii) to ensure that procedures necessary to safeguard the integrity of plant operations are established, including exam administration procedures; (iii) to discuss my views with members of my staff; (iv) to follow-up on any problem which potentially reflects on the integrity of our operations; and (v) to set a good example, both in attitude and in conduct, for my staff. It is my intention to make every effort to ensure cheating does not occur in the future.

V. Staffing

At the present time, we have employed 13 control room operators (one of whom has just submitted his resignation) who took the NRC RO exams last month. There are 4 shift foremen, 6 shift supervisors, 4 shift technical advisors, 3 Training personnel, and 2 non-shift Operations personnel who took the October, 1981 NRC SRO (and RO) exams. Assuming an 80% pass rate on these exams, which has been the typical performance of TMI-1 personnel on NRC exams, there will be 10 RO and 15 SRO-qualified personnel available. It is impossible to ascertain, without knowing exactly which individuals pass these exams and which fail, the makeup of a typical shift. However, I do feel that it is likely that we will not be able to maintain a six shift rotation, and will thus utilize a five shift rotation for a period of time. It is also possible that for that period of

time, we will utilize Training personnel on shift who have successfully passed the SRO examinations.

Given the figures stated above, and while I am unable at this time to define the exact shift makeup, I reiterate our commitment that we will meet our control room staffing commitment to the Commonwealth of Pennsylvania, as set forth in the PID at ¶ 583(9), which was one of the conditions for restart articulated by the Board.

Second, I am hopeful that we will soon have at least four additional CROs available for shift work. At the present time, five CROs are in training, along with one Training staff member who is seeking an RO license. NRC reactor operator examinations are anticipated to be taken by these individuals in February or March of 1982. In addition, we are planning and hope to reach the manning level of 24 control room operators and 13 senior reactor operators (7 shift supervisors and 6 shift foremen) at TMI-1 next year, and have allocated sufficient resources to meet these manning levels.

Finally, I am not concerned about the use of a five shift rotation, which provides for three regular on-duty shifts, one off-shift, and one shift which is in training. Missing is the relief shift, which instead overlaps with the training shift. Of course, over an extended period of time, a five shift rotation can reduce the effectiveness of the training program because when there are absences in the regular on-shift crews, individuals in training must fill those gaps.

However, I do not anticipate this schedule to last for an indefinite period of time, and I believe that the continuous training program which exists at TMI allows individuals who miss a day of training to still maintain the requisite knowledge level, by training's providing to these individuals the materials they missed, and requiring operators to take quizzes. Moreover, with five rather than six shifts, more training hours per shift are scheduled for the year.

VI. Certification of Licensed Operators to Take the NRC Examinations

Since I assumed the job of Vice President (formerly titled the Director) of TMI-1 in September of 1980, there have been two sets of NRC examinations which required my certification, those taken last April, and the recent October examinations. The process I used to determine the readiness, from both a competence and integrity standpoint, of the April and October, 1981 candidates is described below.

In general, I do feel that we can be legitimately criticized for not formalizing our certification process by establishing a written certification procedure. It is my intention and commitment to institute such a procedure prior to certifying our next group of operator candidates. A comparable procedure will be instituted for the annual recertification process. By specifically stating in a procedure the necessary reviews of candidate qualifications which must take place prior to certification, we provide a means of verifying the adequacy of the certification process. However, this is not to say that

the certifications which I made in the past, were substantively inadequate. On the basis of the reviews I have participated in this year, I am fully satisfied that our existing certification process is a valid means of determining the readiness of an individual to sit for the NRC examinations. However, we do need to be more formal in the way we document and maintain records of this process.

I would like to emphasize one point. In my mind, certification to sit for the NRC examinations is only the first in a two step process. As the Vice President of TMI-1, it is my job to ensure that individuals are not only qualified, from a licensing point of view, to operate TMI-1, but are people I believe are qualified and have the proper attitude to staff the TMI-1 control room. Thus, the certification process which I undertake includes not only determining that an individual is ready to take the NRC exams, but re-assessing, after the exam results are in, whether individuals who have passed the NRC exams are the right individuals for the job. I anticipate formalizing this re-assessment process in the TMI-1 certification procedure.

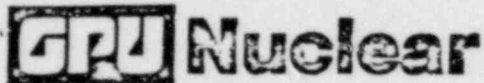
The method I employed in certifying candidates to take the NRC exams last April involved a lengthy meeting with Mr. Herbein, the Vice President of Nuclear Assurance and former Director of TMI-1, Mr. Toole, the Director of Operations and Maintenance at TMI-1, Mr. Ross, the Manager of Plant Operations, Dr. Knief, the Manager of Training at TMI, Mr. Newton, the Manager of Operator Training at TMI, and

Mr. Brown, the Supervisor of Licensed Operator Training at TMI. As a group, we reviewed the results of each candidate on the April ATTS examinations, the performance of individuals during the past year's training program, and the performance of individuals on the job. Each candidate was reviewed separately. Weaknesses of particular individuals, whether in training or on-the-job, were discussed.

For this group of individuals, attitude or performance problems were absent. Several individuals had required special training during the year, and we reviewed the competency of these individuals. I discussed these personnel with Messrs. Arnold and Clark, and we all agreed the individuals appeared to be sufficiently capable to take the NRC examinations. If I had thought that any individual would most likely not succeed on the NRC exams, I would not have certified him.

Last month, in certifying individuals for the NRC exams, I held a similar, long meeting. Again, we reviewed each candidate's records individually, focusing upon potential weaknesses in capabilities and attitude of individuals. One individual was not certified because we reached a consensus that he simply was not ready to take the NRC examinations. A second individual's negative attitude about the Company was discussed; however, because of his conscientiousness and high level of competency on the job, and full understanding of his responsibilities as a licensed operator I certified him for the examination. Questions were not raised with respect to the other candidates.

Finally, while Mr. Ross' testimony will discuss the issue of certifying integrity, I would like to reaffirm Mr. Ross' view that such an evaluation is inherently subjective, and would only suffer from formalization in a procedure. Thus, while I intend to include in the TMI-1 licensed operator certification procedure the requirement that operator attitude be evaluated, I do not intend to further specify the means of conducting this evaluation. Clearly, however, individuals who reflect a lack of respect for the licensing process by cheating on exams have an unacceptable attitude.



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Dear

Recent reviews of our nuclear activities by ourselves as well as by outside organizations have alerted us to the need to ensure that our employees understand the role of various regulatory requirements in the way we conduct our activities. Corporate policy statements are being prepared on these matters; however, as one of the initial steps in correcting this situation at TMI Unit 1, I am sending this letter to members of my staff who are most centrally involved in the activities affected by these regulatory requirements and, therefore, are in the best position to effectively address this situation.

One of the issues which needs to be addressed is the way we look at regulatory requirements for conducting such activities as tests, inspections, and surveillances and for maintaining documentation of this work. During the course of the INPO review, it became clear that these efforts are sometimes viewed as "motions" to be gone through because the NRC requires us to do it. The very real value of the activities to us and the need to do them effectively for our own purposes tends to be lost in the process. It is important that we as operators of TMI-1 recognize that the way we are fulfilling the requirements is consistent with what we desire and need to do. For example, surveillance tests need to be done carefully and thoughtfully with equipment performance and conditions observed closely and critically, identified problems understood and corrected, and the results documented and thoroughly reviewed. The objective is not just a completed check-off list, the objective is primarily an assessment of the reliability and material condition of the plant equipment. There is a lot more to the monthly surveillance of the emergency diesels than just showing they will start and carry the required load. Let's be sure we obtain the full benefit of such tests, inspections, etc.

Another issue that has received a lot of attention recently is understanding the role of the training and qualification program for licensed operators in assuring safe and reliable operations. As a result of the cheating incident in the NRC licensing examinations, we have been reviewing our own examination program and the attitudes toward these examinations and

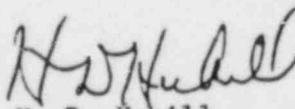
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the NRC examinations. This review has indicated that because the results on a written examination are not by themselves a sufficient basis for determining if an operator is qualified, an attitude has tended to develop which views the examinations as unrelated to determining an operator's qualification.

We will work with the Training Department and the NRC (in the case of licensed operators) to try to assure examinations are prepared properly; however, we rely upon you to understand the importance of examinations and display a proper attitude towards them. Our view of their importance includes:

- (1) Examinations are an essential element of an effective education and training program,
- (2) Objective measurements of the knowledge and understanding of plant behavior, equipment, systems and procedures are necessary to determine if an operator is qualified,
- (3) NRC examinations are one important and necessary element of the licensing process in determining qualifications of a license candidate, and
- (4) Because of the potential for a nuclear plant to affect the health and well-being of the people living in the vicinity of the plant, we have an obligation to demonstrate by our attitudes, our actions and our administration of examinations that examinations are taken seriously and that they meaningfully measure the knowledge and understanding of the operator on the material covered by the examination.

I urge you to reflect on your own attitude toward these issues. You are one of those we depend upon to understand them and carry out your work assignments consistent with those understandings. Because of the importance of these issues, department heads will be scheduling group meetings in the near future to discuss these and other related issues in more detail.


H. D. Hukill
Director, TMI-1