



ARKANSAS POWER & LIGHT COMPANY

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May 17, 1984

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Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Review of Operating Licensing Examinations

Gentlemen:

It has recently come to my attention that Region IV Operator Licensing Examiners have been directed to discontinue the long standing practice of allowing a concurrent review of the RO and SRO written examinations by a few knowledgeable members of the facility staff. Guidelines for this concurrent review of written examinations were recently published by the NRC in NUREG-1021, Examiner Standard ES-201. I believe the new practice of delaying the written examination review until the last test paper is turned in is not in the best interests of either the licensed operator applicants or the Commission, itself, for reasons discussed in this letter.

I believe there are three basic reasons why deferring the review of the written examination questions until completion of the examination will prove counter productive.

1. The inclusion of invalid questions, or questions that contain incorrect technical information can put an unfair burden on the examinees. This situation will frequently result in the examinee spending a disproportionate amount of time to rationalize an answer to a confusing question. The conduct of operator examinations is a very stressful situation for the operator applicants, and the failure to resolve unclear questions as soon as possible will only add to this situation.
2. The inability of knowledgeable facility staff members to review exam questions prior to their administration will lead to more disputes over the grading of examination answers. This will likely lead to increased appeals and an increased workload for an already overburdened operator licensing staff.

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3. The written examinations are organized and constructed to probe comprehension of a wide variety of subject matter. NUREG-1021 provides requirements for the topics to be covered and weighing of these topics. If several questions have to be invalidated and rejected from consideration, the content validity of the entire examination to sample sufficient topics could be compromised. This would result in the examination not being educationally considered a valid measurement instrument of subject matter comprehension. This situation would be unfair to the examinee.

I realize that a couple of incidents in which the integrity of the examination process was compromised have probably lead to the decision to make this change. The Commission and its staff are entirely justified in taking steps to insure the honesty of the conduct of examinations because any cheating not only invalidates the test results, but lowers public confidence in the entire commercial nuclear industry and its regulatory process. I feel a preferable approach to guarantee the integrity of the examination process is to continue with the staff's recently implemented tighter security of the examination. The rigid quarantine of the examinees from having contact with any facility staff member is the way to accomplish this objective without penalizing the examinees.

I trust that you and members of your staff will be able to give consideration to my concerns as we pursue our common goal of maintaining the integrity of and confidence in the examination process, while providing a correct and fair examination for the licensed operator applicants.

Very truly yours,


John M. Griffin

JMG:DH:ac

cc: Mr. John T. Collins
Regional Administrator
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Region IV
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