March 14, 2000

Mr. D. R. Gipson
Senior Vice President
Nuclear Generation
The Detroit Edison Company
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: OPERATOR LICENSING EXAMINATION REPORT 50-341/2000301(DRS)

Dear Mr. Gipson:

The Nuclear Regulatory Commission examiners completed initial operator licensing examinations at your Fermi 2 Nuclear Station on February 4, 2000. The license applicants' performance evaluations were finalized on February 28, 2000. During the examination preparation, validation, and administration, the examiners reviewed several administrative and operating procedures. The enclosed report presents the results of the examination and concurrent operation's inspection.

The examiners administered operating and written examinations to one reactor operator and five senior reactor operator license applicants. All six applicants passed all sections of the examination and were issued operating licenses. The applicants were well prepared for the examination. The licensed shift operators involved in the examination validation provided good insight for improving examination quality. Your training staff provided satisfactory support during the examination process.

It is our expectation that the Fermi training department will use the examination and applicant deficiencies outlined in the accompanying report as feedback to improve the operator license training program in accordance with your Systematic Approach to Training program.

Based on the results of this inspection, the NRC has determined that a violation of NRC requirements occurred. Specifically, a lack of understanding and sensitivity on the part of some plant staff regarding examination security measures resulted in three instances in which examination integrity was adversely affected. However, this violation is being treated as a Non-Cited Violation (NCV), consistent with Appendix C of the Enforcement Policy. The NCV is described in the subject inspection report. If you contest the violation or severity level of the NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with copies to the Regional Administrator, Region III, and the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington DC 20555-0001.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosures to this letter will be placed in the NRC Public Document Room.

We will gladly discuss any questions you have concerning this examination.

Sincerely,

/RA/

David E. Hills, Chief
Operations Branch
Division of Reactor Safety

Docket No. 50-341
License No. NPF-43

Enclosures:
1. Inspection Report 50-341/2000301(DRS)
2. Simulation Facility Report
3. Written Examination and Answer Keys (RO and SRO)

cc w/encls 1 & 2:
N. Peterson, Director, Nuclear Licensing
P. Marquardt, Corporate Legal Department
Compliance Supervisor
R. Whale, Michigan Public Service Commission
Michigan Department of Environmental Quality
Monroe County, Emergency Management Division
Emergency Management Division
MI Department of State Police

cc w/encls 1, 2 & 3:
L. D. Sanders, Training Department

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No:	50-341
License No:	NPF-43
Report No:	50-341/2000301(DRS)
Licensee:	The Detroit Edison Company
Facility:	Fermi 2
Location:	6400 North Dixie Highway Newport, MI 48166
Dates:	January 31 - February 4, 2000
Examiners:	M. Bielby, Chief Examiner, RIII H. Peterson, Examiner, RIII R. Vogt-Lowell, Resident Inspector - Perry Station
Approved by:	David E. Hills, Chief, Operations Branch Division of Reactor Safety

EXECUTIVE SUMMARY

Fermi 2 Nuclear Power Plant
NRC Inspection Report 50-341/2000301(DRS)

A licensee developed and NRC approved initial operator licensing examination was administered by the NRC to six operator license applicants. One applicant applied for a Reactor Operator (RO), and five applied for Senior Reactor Operator (SRO) licenses. Two of the SRO applicants were previously licensed at the facility as ROs. The examination process included development, validation, and administration of a written and operating examination to each applicant.

Examination Results:

All applicants passed all portions of the examination and were issued operating licenses.

Examination Preparation and Administration:

The licensee's shift operators and license applicants were able to use the provided administrative and operating procedures efficiently and correctly during the operating examination validation and administration (Section O3.1).

The examiners considered the licensee's submitted outline and proposed examination to be satisfactory. The licensed shift operators involved in the examination validation provided good insight for improving examination quality (Sections O4.1 and O5.2).

The licensee's training staff satisfactorily administered the written examination and provided satisfactory support during the operating examination. The licensee's submittal of post examination documentation was satisfactory. There were no post examination comments (Sections O5.3 and O5.6).

The applicants were confident and well prepared for the operating and written examination based on overall examination results. However, the examiners identified some knowledge and performance deficiencies. In particular, at least half of the applicants incorrectly answered the same six written examination questions, and several applicants failed to verify three phase voltage values during an Emergency Diesel Generator paralleling job performance measure (Section O5.4).

The licensee had appropriate procedures established to control examination security. However, the examiners identified a non-cited violation involving a lack of understanding and sensitivity on the part of some plant staff regarding examination security measures that resulted in three instances in which examination integrity was adversely affected. These instances involved leaving an examination material locker unlocked, leaving a computer disk containing the examination scenarios unattended in a non-secure location, and an unauthorized individual entering the examination area contrary to posted signs (Section O5.5).

Report Details

I. Operations

O3 Operations Procedures and Documentation

O3.1 General Comments

a. Scope (71707)

The examiners reviewed portions of selected administrative and operating procedures during review, validation, and administration of the initial license examination using Inspection Procedure 71707. See the end of this report for a partial list of procedures reviewed.

b. Observations and Findings

The NRC examiners observed that most procedures were well organized and normally used correctly by the shift operators and by the license applicants during the operating examination validation and administration.

At least half of the applicants had difficulty properly executing one System Operating Procedure (SOP 23.307) during their system Job Performance Measure (JPM) examination (Section O5.4).

c. Conclusions

The licensee's shift operators and license applicants were able to use the provided administrative and operating procedures efficiently and correctly during the operating examination validation and administration.

O4 Operator Knowledge and Performance

O4.1 General Comments-Licensed Shift Operators

The examiners observed performance of three shift operators who validated the operating examination. The operators provided good insights for improving examination quality on nine administrative and ten system JPMs, and three dynamic simulator scenarios. The operators demonstrated satisfactory performance and knowledge of their responsibilities during the validation.

O5 Operator Training and Qualification

O5.1 General Comments-Initial Operator License Examination

The licensee submitted the proposed written and operating examination ahead of schedule. The licensee examination quantitatively contained the required written questions, JPMs and scenarios to adequately evaluate the applicants. The examiners

reviewed and discussed examination comments with the licensee in the regional office during the week of January 3, 2000, and validated the examination at the site during the week of January 10, 2000.

O5.2 Pre-Examination Activities

a. Scope

The licensee's training staff prepared and submitted an outline and proposed initial operator license examination to the NRC for review and comment.

b. Observations and Findings

The licensee's training staff used the guidance prescribed in NUREG 1021, Operator Licensing Examination Standards for Power Reactors (ES), Revision 8, dated April 1999, to prepare the outline, operating and written examinations. The licensee submitted the proposed outline and examination to the NRC ahead of schedule. The NRC examiners reviewed and commented on the licensee's proposed examination submittal, and the licensee effected changes agreed upon between the NRC and the facility licensee in accordance with NUREG 1021 prior to the validation week. Subsequent to the incorporation of NRC examiner comments and final review, a potential examination compromise (Section O5.5) necessitated the replacement, review, and re-validation of three new examination scenarios.

c. Conclusions

The examiners considered the licensee's submitted outline and proposed examination to be satisfactory.

O5.3 Examination Administration

a. Scope

The NRC examiners administered the examination using the guidance prescribed in Sections ES-302 and ES-402 of NUREG 1021. The examiners administered the operating examination, consisting of JPMs and dynamic scenarios, February 1 - 3, 2000. The licensee's training staff administered the written examination on February 4, 2000.

b. Observations and Findings

Operating Examination

The training staff's support of the examination process was satisfactory. Turnover sheets, surveillances, procedures, and other paperwork required to support the administration of the operating examination were generally correct and detailed. Shift turnovers provided by the instructors during the dynamic scenarios were typical of those used during the training process and varied slightly from those used in the control room. The licensee's daily setup and execution of the operating portion of the examination during the validation and administration weeks was timely and generally accurate.

However, during administration of the dynamic scenarios, the examiners observed one instance of procedures not being replaced after being marked by applicants during a previous run of the same scenario.

Generally, the scenarios performed satisfactorily. However, during the initial run of Scenario 1 major transient (recirc loop rupture with loss of high pressure feedwater), Residual Heat Removal (RHR) was not required to restore reactor water level (RWL) as originally validated. The event was twice validated by an operating shift crew to ensure an adequate line break size after emergency depressurization that would require the operator to re-align and manually initiate the non-selected Low Pressure Coolant Injection (LPCI) RHR loop to restore the decreasing RWL. During the next administration of the scenario, the lead examiner directed the simulator operator to increase the break size to require the same effect. The examiners determined that the scenario remained discriminating, but not as challenging as intended.

The examiners also noted that on one occasion during performance of the administrative JPM for performing a short term relief, the Reactor Recirculation Sample Valves, B3100-F019 and -F020, were inadvertently left open during the simulator setup.

Written Examination

The licensee administered the written examination in their training center classroom. The room contained a satisfactory arrangement of tables and spacing between the applicants. An instructor read the examination requirements to the applicants prior to the examination and verified that applicants had all of the required examination references and materials. The examination was completed within the allowable five hours.

c. Conclusions

The licensee's training staff satisfactorily administered the written examination and provided satisfactory support during the operating examination.

O5.4 License Applicant Performance

a. Scope

The NRC examiners administered the operating examination, and the licensee administered the written examination to one RO and five SRO applicants. The examiners evaluated the applicants' performance using dynamic scenarios, JPMs, and written examinations in accordance with ES-303, "Documenting and Grading Initial Operating Tests," and ES-403, "Grading Initial Site-Specific Written Examinations," contained in NUREG 1021, Revision 8.

b. Observations and Findings

Operating Examination

The NRC examiners determined that the overall performance of all six applicants during the dynamic scenario examination was satisfactory. The examiners identified individual discrepancies, but did not consider any generic. The examiners identified that applicants quickly found and correctly executed appropriate procedures. Applicants generally communicated clearly and accurately using three-way communications. The examiners noted two instances when applicants were speaking over one another, but no mis-communications resulted. Applicants in control board positions performed self-checking during normal and transient conditions. While in the shift supervisor position, the applicants generally maintained their position of oversight, performed peer checks during normal evolutions, and conducted informative briefings at appropriate times.

Although the examiners identified individual discrepancies, the overall performance of all six applicants during the administrative and system JPMs was satisfactory. Examiners identified one generic deficiency during performance of the system JPM for paralleling Emergency Diesel Generator (EDG) 14 from the Control Room to Bus 65F. Applicants were expected to use SOP 23.307 to start and parallel EDG 14 to Bus 65F. A procedural caution following Step 6 reminded applicants of the potential consequence of failure to ensure EDG output voltage was greater than the bus voltage on each of the respective three phases before synchronizing and closing the EDG output breaker. At least three of the applicants failed to have the local operator verify the voltage values on all three phases; however, the action was not considered critical in that instance.

Written Examination

All six of the applicants passed the written examination with scores ranging from 87 percent to 96 percent. The licensee performed a preliminary assessment of the common questions that were incorrectly answered on the written examination. The licensee considered questions as potential generic knowledge deficiencies based on incorrect answers by at least half of the applicants. The licensee trained the applicants on the potential knowledge deficiencies during their post-exam review. Furthermore, as part of their corrective action program, the licensee wrote Corrective Action Resolution Document (CARD) 99-16945, to have an analysis done to determine if the content of the initial license operator program would need to be changed to address the weaknesses.

Question #	(% incorrect) Potential Knowledge Weakness
#7(RO/SRO)	(50%) Misconception that the non-Automatic Depressurization System (ADS) Safety Relief Valves do not transfer to the alternate power supply upon failure of the primary power supply.
#15(RO/SRO)	(83%) Knowledge of the start interlock between the Reactor Recirc Motor Generator and Drive Motor Breaker position.
#28(RO/SRO)	(50%) Knowledge of whether the main turbine generator mechanical overspeed trip testing on-load device was prevented electrically or mechanically.

#33(RO/SRO)	(50%) Knowledge of why control rods did not insert based on analysis of Anticipated Transient Without Scram (ATWS) conditions.
#37(RO/SRO)	(50%) Knowledge of the Digital Load Sequencer operation after closure of the EDG output breaker.
#88(SRO)	(60%) Knowledge of the bases for limiting Drywell to Torus differential pressure.

c. Conclusions

The applicants were confident and well prepared for the operating and written examination based on overall examination results. However, the examiners identified some knowledge and performance deficiencies. In particular, at least half of the applicants incorrectly answered the same six written examination questions, and several applicants failed to verify three phase voltage values during an Emergency Diesel Generator paralleling job performance measure.

O5.5 Examination Security

a. Scope

The examiners reviewed and observed the licensee's implementation and controls of examination security during the examination preparation and administration. The examiners reviewed the licensee's procedure for maintaining examination security, Operations Training Policy (OTP) OTP-020, "Examination Safeguards and Controls," Revision 0, dated September 9, 1999.

b. Observations and Findings

The examiners determined that the licensee had established appropriate procedures to control examination security. The licensee training staff coordinated the arrival times of the applicants and provided escorts to maintain examination security during administration of the operating examination. However, during the initial license examination process, the examiners noted three events adversely affecting the integrity of the NRC examination.

The first event occurred during examination preparation by the licensee. Licensee personnel discovered the initial license examination room examination material locker (filing cabinet) was unlocked and unattended at approximately 1:30 p.m. on December 28, 1999. The filing cabinet and combination lock device were in good condition and not physically disturbed. The following actions were taken:

- Review of OTP-020 examination security procedure to verify requirements;
- Inventory of material in the locker revealed none were missing or the placement disturbed;
- Security was contacted and verified no door alarms during the time when the room was unattended (December 22 - 28, 1999); and

- Notification of NRC Region III Chief Examiner.

The licensee took short term corrective action to counsel responsible personnel and generated CARD 99-19040 to track the event for subsequent evaluation and long term corrective actions.

The second event occurred after the examination had been prepared by the licensee, but prior to the examination administration week. On January 28, 2000, a licensee training instructor discovered that a floppy disk containing NRC initial license examination dynamic scenarios had been inadvertently left inserted in the computer at the simulator console. The instructor turned the disk over to the Operations Training Supervisor who secured the disk. The licensee conducted initial interviews and believed that none of the examination material was viewed by any applicants, trainees or others that had not signed the security agreement. The NRC Region III Chief Examiner was notified at 10:00 a.m., January 28, 2000. Additional discussions between the licensee and Chief Examiner noted the following approximate time-line:

January 27, 2000	
1:30 p.m.	Examination preparer completed validation of the scenarios, cleared the simulator and computer memory of scenario traces, and turned the simulator over to a License Operator Requalification Training (LORT) instructor that was preparing training events for the Initial License Operator applicants.
3:30 p.m.	LORT instructor left for the day, but allowed the applicants to continue training on their own recognizance since at least two of them had the required knowledge to operate the simulator.
4:00 p.m.	Another staff instructor returned, shutdown, and cleared the simulator computer memory for the day.
January 28, 2000	
7:30-10:00 a.m.	Computer restarted, floppy disk discovered, initial interviews conducted, Chief Examiner notified of the potential scenario examination compromise.

Due to concerns about examination integrity, the licensee took short term corrective action to prepare three new initial license examination scenarios prior to the scheduled examination week utilizing their full, normal Quality Assurance process that included management review. The NRC examiners arrived at the site one day prior to the scheduled examination week to perform a preliminary review of the new scenarios. On January 31, 2000, the NRC examiners completed their review and validation in accordance with NUREG 1021, Section ES-301 and Appendix D. The examiners utilized a shift operating crew during the validation. The licensee incorporated all comments and changes prior to the scheduled start of the operating examination on February 1, 2000. The licensee generated CARD 99-9040 to track the event for subsequent evaluation and long term corrective actions.

The third event occurred during the examination administration on Tuesday, February 1, 2000. A person not signed on the security agreement, violated a sign posting on the simulator door during the NRC administration of one dynamic scenario. The individual

was immediately apprehended by the simulator operator and escorted out of the simulator. At the conclusion of the scenario, the Chief Examiner discussed the incident with the Operations Training Supervisor and simulator operator, and determined the scenario had not been compromised based on the short duration of the incident and tall panels that blocked the sight of vision of the individual. However, the examination integrity had been adversely impacted. During the remainder of the operating examination, a member of the training staff was continuously posted at the simulator door entrance to create a positive control of personnel entering the simulator.

These three examination security events are examples of a violation of 10 CFR 55.49, "Integrity of Examinations and Tests," which requires that facility licensees shall not engage in any activity that compromises the integrity of any examination required by 10 CFR Part 55 (50-341/2000301-01(DRS)). This Severity Level IV violation is being treated as a Non-Cited Violation, consistent with Appendix C of the NRC Enforcement Policy. This violation is entered in the licensee's corrective action program as CARD 99-16945 and CARD 99-19040.

c. Conclusions

The licensee had appropriate procedures established to control examination security. However, the examiners identified a non-cited violation involving a lack of understanding and sensitivity on the part of some plant staff regarding examination security measures that resulted in three instances in which examination integrity was adversely affected. These instances involved leaving an examination material locker unlocked, leaving a computer disk containing the examination scenarios unattended in a non-secure location, and an unauthorized individual entering the examination area contrary to posted signs.

O5.6 Post Examination Activities

a. Examination Scope

The NRC examiners independently graded the written examinations and compared their results to the licensee's in accordance with form ES-403-1, "Written Examination Grading Quality Assurance Checklist." The examiners evaluated individual applicant performance and reviewed the licensee's post examination documentation in accordance with Sections ES-303, ES-403, and ES-501, of NUREG 1021.

b. Observations and Findings

The examiners' evaluations and documentation captured the individual applicant performance deficiencies. The licensee's post examination submittal included the necessary documentation in accordance with ES-501, "Initial Post Examination Activities." The submittal included an analysis of the written examination results and matrix of incorrectly answered questions by more than 50 percent of the applicants. The licensee's analysis identified and incorporated feedback of potential knowledge deficiencies to their training program (Section O5.4). The licensee did not submit any post examination comments.

c. Conclusions

The licensee's submittal of post examination documentation was satisfactory. There were no post examination comments.

O5.7 Simulator Fidelity

a. Examination Scope

The examiners observed operation and fidelity of the licensee's plant specific simulator during the operating examination.

b. Observations and Findings

The simulator performed satisfactorily throughout the NRC license examination.

c. Conclusions

The simulator performed satisfactorily throughout the examination with no noted deficiencies (Enclosure 2, Simulation Facility Report).

V. Management Meetings

X1 Exit Meeting Summary

The chief examiner presented the examination team's observations and findings to members of the licensee's management on February 4, 2000. The licensee acknowledged the findings presented and indicated that no proprietary information had been identified during the examination or at the exit meeting.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

W. O'Connor, Assistant Vice President
J. Davis, Director, Nuclear Training
L. Sanders, General Supervisor, Operations Training
K. Snyder, Supervisor, Operations Training
S. Stasek, Supervisor, Independent Safety Engineering Group

NRC

S. Campbell, Senior Resident Inspector, Fermi

INSPECTION PROCEDURES USED

IP 71707: Plant Operations

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

50-341/2000301-01	NCV	Three examples of failure to maintain integrity of the NRC license examination due to inadequate security practices which is a violation of 10 CFR 55.49 (Section O5.5).

Closed

50-341/2000301-01	NCV	Three examples of failure to maintain integrity of the NRC license examination due to inadequate security practices which is a violation of 10 CFR 55.49 (Section O5.5).

Discussed

None

LIST OF ACRONYMS USED

ADS	Automatic Depressurization System
AOP	Abnormal Operating Procedure
APRM	Average Power Range Monitor
ATWS	Anticipated Transient Without Scram
CARD	Corrective Action Resolution Document
CFR	Code of Federal Regulations
DRS	Division of Reactor Safety
EDG	Emergency Diesel Generator
EOP	Emergency Operating Procedure
ES	Examiner Standards (NUREG 1021, Operator Licensing Examination Standards for Power Reactors, Revision 8, April 1999)
HVAC	Heating, Ventilation, Air Condition
JPM	Job Performance Measure
LORT	License Operator Requalification Training
LPCI	Low Pressure Coolant Injection
NRC	Nuclear Regulatory Commission
OTP	Operations Training Policy
RHR	Residual Heat Removal
RO	Reactor Operator
RPS	Reactor Protection System
RPV	Reactor Pressure Vessel
RWL	Reactor Water Level
SLC	Standby Liquid Control System
SOP	System Operating Procedure
SRO	Senior Reactor Operator

PARTIAL LIST OF PROCEDURES REVIEWED

Abnormal Operating Procedure (AOP):
AOP 20.106.07, “Control Rod Drift,” Revision 16; Immediate Actions, Subsequent Actions, and Symptoms - Multiple Control Rod Drift
AOP 20.000.19, “Shutdown from Outside the Control Room,” Revision 28; Steps 10 - 17

Emergency Operating Procedure (EOP):
EOP 29.100.01, Sheet 1, “RPV Control,” Revision 7
EOP 29.100.01, Sheet 1A, “RPV Control - ATWS,” Revision 7
EOP 29.100.01, Sheet 2, “Primary Containment Control,” Revision 6
EOP 29.100.01, Sheet 3, “RPV Flooding, Emergency Depressurization, & Steam Cooling,” Revision 5
EOP 29.100.01, Sheet 3A, “RPV Flooding & Emergency Depressurization - ATWS,” Revision 7
EOP 29.100.01, Sheet 5, “Secondary Containment and Radiation Release,” Revision 6
EOP 29.100.01, Sheet 6, “Curves, Cautions, and Tables,” Revision 7

System Operating Procedure (SOP):
SOP 23.307, “Emergency Diesel Generator System,” Revision 63; Section 6.1, Paralleling From the Control Room
SOP 23.404, “Standby Gas Treatment System,” Revision 35; Section 6.1, SGTS (Standby Gas Treatment System) Manual Startup
SOP 23.316, “RPS (Reactor Protection System) 120V (volt) AC (Alternating Current) And RPS MG (Motor Generator) Sets,” Revision 39; Section 5.0, Powering RPS Bus A(B) from RPS Alternate Transformer A(B)
SOP 23.205, “Residual Heat Removal,” Revision 67; Section 7.5, Forced LPCI Loop Select Logic Operation
SOP 23.707, “Reactor Water Cleanup,” Revision 95; Section 8.2, Blowdown Operation
SOP 23.127, “Reactor Building Closed Cooling Water/Emergency Equipment Cooling Water System,” Revision 69; Section 7.2, RBCCW (Reactor Building Closed Cooling Water) Restoration Following EECW (Emergency Equipment Cooling Water) SYSTEM Auto/Manual Initiation
SOP 23.413, “Control Center HVAC (Heating, Ventilation, Air Conditioning),” Revision 54; Section 7.10, Control Center HVAC Manual Mode Shift To Chlorine

General Administration Conduct Manual, MGA04, “Temporary Change Notices,” Revision 7
Operations Conduct Manual MOP07, “Shift Turnover,” Revision 2; Section 2.3, Short Term Relief
Operations Training Policy, OTP-020, “Examination Safeguards and Controls,” Revision 0
Radiation Protection Conduct Manual, MRP12, “Requesting Dose Extensions,” Revision 3

Enclosure 2

SIMULATION FACILITY REPORT

Facility Licensee: Fermi 2

Facility Licensee Docket No: 50-341

Operating Examinations Administered: February 1 - 3, 2000

The following documents observations made by the NRC examination team during the initial license examination. These observations do not constitute audit or inspection findings and are not, without further verification and review, indicative of non-compliance with 10 CFR 55.45(b). These observations do not affect NRC certification or approval of the simulation facility other than to provide information which may be used in future evaluations. No licensee action is required in response to these observations.

During the conduct of the simulator portion of the operating examinations, the following items were observed:

ITEM	DESCRIPTION

1. None