



MNTA INSTRUCTOR WORKSHOP -

*NRC PRESENTATION OF
SELECTED OPERATOR LICENSING
PROGRAM TOPICS*
(handouts)

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OBJECTIVES

- Discuss the importance of consistency to the NRC including a discussion of the measures taken by the NRC to ensure consistency in the administration of the operator licensing program;
- Discuss establishing open communications with the NRC during the examination development and review process;
- Discuss documentation of examination quality in examination reports (NUREG-1021, ES-501); and
- Discuss recent operator licensing examination quality issues.

ESTABLISHING *OPEN* COMMUNICATIONS

- In an effort to streamline the examination development and review process, the NRC has been encouraging licensees to establish communications with the Chief examiner early in the process and to continue open discussions throughout.
- As discussed in NUREG-1021, ES-201, the licensee is encouraged to raise examination concerns to the chief examiner. If concerns are not resolved at that level, the licensee is encouraged to raise the concern to NRC Regional management, or to the Chief of the NRR Operator Licensing Program Office as appropriate.

CONSISTENCY

- The NRC's performance goals include:
 - Maintaining safety;
 - Enhancing public confidence;
 - Increasing efficiency/effectiveness of key NRC processes; and
 - Reducing unnecessary regulatory burden.
- Ensuring consistency in the administration of the Operator Licensing program helps the NRC meet the above performance goals.

CONSISTENCY (con't)

- Some examples of how the NRC *strives* for consistency:
 - Branch Chief reviews exam comments (those potentially requiring question modification or replacement) prior to discussion with the licensee;
 - Chief examiners to discern the difference between “required changes” and “enhancements” prior to discussing comments with the licensee;
 - NRC Regional Offices are subject to NRC HQ audits;
 - Chief examiners consult with NRC operator licensing program office (HQ) on issues;
 - NRC Regional Offices performing examiner exchanges with the other Regional Offices and HQ;
 - Regional examiner meetings and training;

CONSISTENCY (con't)

- In-field audits of examiners by the NRC Regional Branch Chief; and
- NUREG-1021, ES-201 states that the NRC regional offices shall obtain approval from the NRR operator licensing program office before knowingly deviating from the criteria specified in NUREG-1021. Moreover, the regional offices shall obtain program office approval before undertaking any initiative that could undermine interregional examination consistency.

★ THE NRC TAKES CONSISTENCY VERY SERIOUSLY!

Sheet #4a

DOCUMENTATION OF EXAM QUALITY

- If 20% or fewer of the test items for the submitted written examination and operating test (judged separately) required replacement or significant modification, the report will simply state **“the facility licensee’s submittal was within the range of acceptability expected for a proposed examination.”**

DOCUMENTATION OF EXAM QUALITY (con't)

- If more than 20% of the submitted test items required replacement or significant modification, the report shall include a factual description of the test item changes (observations), including the type and number of test items replaced and significantly modified. The report shall also state that **“the overall submittal was outside the acceptable quality range expected by the NRC”** and that **“future examination submittals should incorporate any lessons learned from this effort.”**

RECENT OPERATOR LICENSING EXAM QUALITY ISSUES

- “SRO only” questions:
 - Ensure written exam questions and operating exam events or tasks are developed based on appropriate K/As and that each tests at the appropriate SRO level of knowledge as discussed in 10 CFR 55.43 and NUREG-1021;
- Memory verses comprehension/analysis level questions:
 - Ensure comprehensive/analytical written exam questions are not simply memory level questions with lots of extra information given in the stem; and
- Administrative job performance measures (JPMs):
 - Ensure JPM tasks, as well as the failure to complete those tasks, have *safety-significance*.

Space for Taking Notes

Sheet #7a

CONCLUSION

- Establishing consistency in the administration of the Operator Licensing program helps the NRC achieve it's performance goals, **the NRC takes consistency very seriously**;
- Establish and maintain open communication with the NRC, including chief examiner, the NRC regional office and the NRC Operator Licensing Program Office at NRR;
- Recommend reviewing and understanding NUREG-1021, ES-501 concerning the documentation of examination quality; and
- Be sensitive to the recent issues including ensuring "SRO only" questions are truly "SRO only," ensuring the questions test at the desired cognitive level, and ensuring admin JPM tasks are safety-significant.

"Thank you" for participating...

Sheet #8