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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
OFFICE OF NUCLEAR REACTOR REGULATION  
WASHINGTON, D.C. 20555-0001

April 20, 1998

NRC INFORMATION NOTICE 98-15: INTEGRITY OF OPERATOR LICENSING  
EXAMINATIONS

Addressees

All holders of operating licenses for power reactors except those licensees that have permanently ceased operations and have certified that the fuel has been permanently removed from the reactor vessel.

Purpose

The U.S. Nuclear Regulatory Commission (NRC) is issuing this information notice to advise addressees of several instances of potential compromise of the integrity of operator licensing examinations. It is expected that recipients and individuals with responsibility for development of initial operator licensing examinations will review the information for applicability to their facilities and consider actions, as appropriate, to avoid similar problems. However, suggestions contained in this information notice are not NRC requirements; therefore, no specific action or written response is required.

Description of Circumstances

Conditions of potential compromise of the integrity of operator licensing examinations requiring compensatory action on the part of both facility licensees and the NRC have been identified in all NRC regions:

1. On-Site Custody Control of Examination Materials
  - a. During preparation for initial operator licensing examinations, after NRC examiners had completed final onsite preparations and examination validation, several pages of a written examination were found the following Monday in the duplex tray of a photocopier by the plant clerical staff. The examination was canceled.
  - b. A job performance measure (JPM) script for a scheduled operating test was inadvertently printed on a facility local area network printer outside the designated examination preparation area. At the same facility, the custodial staff found the examination development area unlocked. The examination was in a locked file cabinet in the room, but the key to the file cabinet was accessible. The subject JPM was replaced, and the examination was delayed until the facility could develop another examination using the same sample plan.

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## **2. Control of Physical Access to the Examination Area**

- a. An instructor who was not included in the existing examination security agreement entered the simulator while examination scenarios were being validated, even though the doors were locked and a sign was posted stating "NRC exam in progress. Absolutely no admittance by unauthorized individuals." The instructor was in the simulator control booth, preparing for a future lesson, for approximately 5 minutes before he was noticed and asked to leave. The scenario was deleted from the examination and was replaced with an alternate scenario.
- b. During an examination, two license applicants, who were sequestered while waiting to be called into the simulator, began questioning the proctor about what scenario might likely be included in their examinations. The proctor, being careful not to confirm any part of the examination, responded in a negative manner to prompts regarding a specific scenario. By excluding a familiar and expected scenario from the limited set of validated scenarios, the applicants could possibly anticipate the diagnostic competencies that they would be required to demonstrate during the examination. The scenario set that had previously been validated for that examination was replaced.

## **3. Off-Site Custody Control of Examination Materials**

- a. Two examinations, one an NRC license examination and the other an audit examination at a different facility, were found to be based on identical sample plans and to contain a high percentage of identical test items. The examinations had been developed by the same author. The examination similarities were discovered because a reciprocal agreement existed between the facilities' training departments. New scenarios and test items were substituted for those that were determined to be potentially compromised.
- b. A facility licensee reported to an NRC regional office that examination test items for a different facility in another NRC region had been discovered in its facsimile equipment by the clerical staff. It was subsequently determined that a scheduled licensing examination was being developed by a team of contractors located at three separate facility licensee sites.

## **Discussion**

Under the pilot program described in NRC Generic Letter 95-06, "Changes in the Operator Licensing Program," and its Supplement, and in anticipation of a rule change to 10 CFR Part 55, some power reactor facility licensees have undertaken a larger and more active role in the process of developing examinations through planning, drafting, and validation of examinations and test items. However, the more active role also increases the availability of and access to detailed examination materials. These factors, combined with the longer period of exposure to examination planning and test items, introduce a concomitant increased vulnerability to inadvertent or deliberate compromise of the process, resulting in potential challenges to the integrity of the examination.

NUREG-1021, Rev. 8, "Operator Licensing Examination Standards for Power Reactors," Section ES-201, "Initial Operator Licensing Examination Process," outlines examination security considerations that facility licensees may use to form the basis for an effective security policy with associated administrative procedures for facility examinations. ES-201 provides for facility licensee personnel and contractors working on the facility licensee's behalf to participate in the process for developing examinations and to have prior detailed knowledge of examination content through a security agreement. Each facility licensee employee and contractor with access to the examination development process becomes party to that agreement. Under the security agreement (Form ES-201-3, "Examination Security Agreement") no part of the examination is to be divulged to anyone who has not been authorized by the NRC chief examiner. The examination security agreement also describes possible consequences of violations, with which the NRC staff has dealt by replacing the materials that may have been compromised, delaying or canceling scheduled examinations, and taking enforcement action against the individual or the facility licensee when appropriate. These actions are based on the requirements of 10 CFR 55.49, which state that applicants, licensees, and facility licensees shall not engage in any activity that compromises the integrity of any test or examination. As noted in the Federal Register (62FR42426) publication of the proposed rule change, the NRC considers that a violation of 10 CFR 55.49 has occurred when "(1) a failure to control the integrity of an examination occurs such that there is a potential for an applicant to have an unauthorized advantage in the examination process or (2) an applicant obtains an unauthorized advantage."

This information notice requires no specific action or written response. If you have any questions about the information in this notice, please contact any of the technical contacts listed below or the appropriate Office of Nuclear Reactor Regulation (NRR) project manager.

*for*   
Jack W. Roe, Acting Director  
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Information Notice No.	Subject	Date of Issuance	Issued to
98-14	Undocumented Changes to Non-Power Reactor Safety System Wiring	4/20/98	All holders of operating licenses or construction permits for test research reactors
98-13	Post-Refueling Outage Reactor Pressure Vessel Leak Testing Before Core Criticality	4/20/98	All holders of operating licenses for nuclear power reactors except those that have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel
98-12	Licensees' Responsibilities Regarding Reporting and Follow-up Requirements for Nuclear-Powered Pacemakers	4/3/98	All U.S. Nuclear Regulatory Commission nuclear pacemaker licensees
98-11	Cracking of Reactor Vessel Internal Baffle Former Bolts in Foreign Plants	3/25/98	All holders of operating licensing for pressurized-water reactors (PWRs) except those who have ceased operation and have certified that fuel has been permanently removed from the reactor vessel.
95-52, Supp.1	Fire Endurance Test Results for Electrical Raceway Fire Barrier Systems Constructed From 3M Company Interam Fire Barrier Materials	3/17/98	All holders of operating licenses for nuclear power reactors except those who have permanently ceased operation and have certified that fuel has been permanently removed from the reactor vessel.

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OL = Operating License  
CP = Construction Permit

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