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PRELIMINARY AGENDA FOR PUBLIC MEETING WITH INDUSTRY FOCUS GROUP (FG)
ON OPERATOR LICENSING ISSUES

April 7, 2004; 9:00 a.m. - 12:00 noon
11555 Rockville Pike, Rockville, MD 20852-2738
Room O-3B4

<u>TOPIC</u>	<u>LEAD</u>
● Introductions and Opening Remarks	NRC/FG
● Public Input	Public
● Results of Draft Revision 9 Examinations	NRC
● Comments on Draft Revision 9 of NUREG-1021	NRC/FG
- Most comments fully adopted	
- Selected comments partially adopted (Refer to Items 13, 42, 51, 103, and 105 in Attachment 2)	
- Some comments noted but not adopted (Refer to Items 9, 22, 41, 44, 59, 71, and 96 in Attachment 2)	
- Additional changes and clarifications (Refer to Items 6, 10, 11, 82, 92, 94, 98 - 101, and 112 in Attachment 2)	
● Other Issues	NRC
- Requalification inspection issues (Medical examinations; significance determination process; repeating items on the operating tests; proficiency and testing for SROs who normally work as ROs)	
- Simulator testing	
- K/A catalog project	
- Fatigue rule update	
● Focus Group Issues	FG
● Public Questions and Answers	Public
● Summary / Conclusion / Action Item Review	NRC/FG

ATTACHMENT 2 - DRAFT REVISION 9 COMMENT SUMMARY			
Item	ES-#	COMMENT/RECOMMENDATION	PROPOSED RESOLUTION
1	201	Attachment 4 should be in a letter format so it can be sent to facility licensees.	A letter was added to C.2.i to approve applications and written exam administration; the enclosure will be non-public.
2		Does NRC need to review audit exams if NRC is developing the license exam?	Yes. Form ES 201-2, Items 2.b and 3.a(3) have been edited to remove the "*" indicating that the operating test duplication is not applicable to NRC-prepared exams. Moreover, Section D.1.a of ES-301 has been similarly revised.
3		Revise Form 201-3 to allow instructors with exam knowledge to operate the simulator as in D.2.b.	These items were added to the form as examples of acceptable activities.
4		C.1.f should reference Form 401-6 vice 401-7.	Corrected.
5		The corporate letter should include 2.390 boilerplate.	The boilerplate was added here and in ES-601.
6		The chief examiner should have the option of randomly selecting the crew members.	Section C.3.j has been revised to allow changes up until 2 weeks before the exams begin.
7	202	Clarify need for Regions to audit 10% of the license applications on-site.	Added Section C.2.e to audit approximately 10% of the applications during the prep or exam week.
8		Define "senior management representative on site" as used in C.1.e.	Section C.1.f (formerly C.1.e) has been edited to note that it is equal to an authorized representative of the facility licensee, such as the plant manager or site vice-president.
9		Remove all education and experience requirements and reference the NANT guidelines as the single source.	No change; there is no regulatory requirement to maintain accreditation, and some facility licensees still reference the ANSI standards and Regulatory Guides in their licensing basis documents.
10		The chief reactor watch station is not equivalent to an RO and should not be counted as RNPPE.	Section D.2.a(2) has been edited to remove the chief reactor watch from the list of equivalents.
11		Clarify whether every LSRO has to move at least five fuel assemblies to qualify for a license.	Pursuant to 10 CFR 55.31(a)(5), Section D.3.a has been clarified to require 5 manipulations (e.g., fuel movements). Section D.1.h of ES-204 has also been revised to allow a license delay until the manipulations are complete.
12		The ES should address electronic submittal of the license applications per the new rule change.	Section C.1.f has been edited to reference 10 CFR 55.5 and identify the acceptable means of submittal.

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13	202	NUREG-1021 needs to clarify what qualifies as a significant control manipulation.	Section C.2.b (3 rd paragraph) has been moved to C.1.c; power changes on the simulator must be 10 percent or greater, while those on the plant may be smaller but must have clearly observable feedback.
14	204	To qualify for the upgrade written waiver per D.1.j, an RO should be up-to-date in requal <i>up to the point of entry into the initial license program</i> and have held an active license for 1 year or more.	Section D.1.j(3) has been edited to clarify the requal requirement, but the active license must be within the past two years to satisfy the requirements of 10 CFR 55.47. NRR may approve additional waivers referred by regions.
15		Does an 80% on the RO exam qualify for a waiver if the overall SRO grade is <80%?	Section D.1.a was clarified to exclude such a waiver.
16		Waivers per D.1.a should be limited to 1 year from the date of original test (not the final denial).	Section D.1.a was revised to key the routine Regional waiver to the original exam date.
17		Section D.1.c needs to address medical requirements for license reinstatements.	Section D.1.c has been revised to accept medical data for up to 2 years for license reinstatements, with an NRC Form 398, Item 17 statement.
18		The GFE waiver criteria need to be clarified if an applicant exceeds the 2-year shelf life.	Section D.1.k was added to authorize a routine waiver of the GFE for an applicant who passed a randomly-selected prior exam or one prepared by the facility per ES-205.
19		205	Change the GFE to 4 times per year and 50 questions.
20	205	Clarify the exam mailing instructions per ES-201, Attach 1, so they are not sent to home addresses.	A note that home addresses are not acceptable was added to Attachment 1.
21		Clarify the requirements for the two-year shelf life, including the allowance for licensees to give the "retake" GFE.	This was added to Section D.1.k of ES-204 as a standard Regional waiver.
22		There is no demonstrated need to limit the GFE shelf life to 2 years; the Rev 8 guidance is satisfactory.	Comment noted. The NRC's basis for this change is explained in the minutes from the public focus group meetings.
23		Revise C.2.b to reflect the shift to annual notification letters.	Section C.2.b has been revised to adopt the annual notification letter and C.3.b has been added to require the regions to issue informal reminders.
24		Results letters should no longer be sent to facilities that do not participate in the GFE.	Section C.3.e, Attachment 1, and Attachment 3 have been revised to eliminate the additional letters and note that the exams will be available in the public electronic reading room and on the GFE web site.

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25	205	Should we incorporate provisions for industry reviews in final R9?	Section C.4 has been added to incorporate guidance regarding industry reviews.
26	301	The RO administrative sampling requirements need to be clarified.	The public version of Draft Rev 9 previously clarified the administrative sampling requirements.
27		Some of the topic examples need to be removed or better described to improve discrimination.	The topics are based on 55.45(a)(9) and (10) and are valid examples; RO applicants do not need to be tested on all four administrative topics.
28		Incorporate the RIV form for reviewing the operating test, similar to ES 401-9.	No change; an informal poll of the Regional operator licensing branch chiefs revealed little support for a new form.
29		Define low power scenarios as in ES-601.	A footnote has been added to Sections D.4.b and D.5.c referencing NUREG-1449, which defines low power as 5% or less.
30		Clarify predictability policy for E-plan topics.	A sentence was added to Section D.3.d to caution against becoming predictable.
31		Include all the quantitative JPM requirements on Form 301-3 in language that matches the text.	Form ES-301-1, 2, and 3 have been edited to capture the requirements.
32		Delete operating JPMs for SRO-U applicants.	No change; this is a significant change that was not pilot tested or subject to public comment.
33		Clarify that RO applicants need to rotate between the lead and BOP positions.	Section D.5.a has been clarified.
34		Add a "type code" column to Form 301-1 to match 301-2.	The form has been revised as recommended.
35		Consider allowing the use of administrative questions instead of JPMs.	No change; combining the admin and systems walk-through sections increases the need for uniform testing media.
36		Do not remove paragraph D.3.c.	The subject text was reinstated before Draft Rev 9 was issued for comment.
37		There is no need to put an upper limit on the number of alternate path JPMs.	No change; although the alternate path JPMs are generally better discriminators, removing the upper limit could lead to inconsistency.
38		Add an all-inclusive list of forms to be sent to the NRC in each phase of the exam process.	Form ES-201-1 has been edited to better identify the required materials.

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39	301	Form 301-3, Item 2.b, should reference numbers instead of percentages; the SRO-U limit should be 3 total with no more than 2 in one area.	Forms 301-1 and 301-2 have been revised to include specific test criteria, with Item 2.b of Form 301-3 referring to the other forms. Admin repeats for SRO-U and SRO-I applicants should be the same (1).
40		The limits on JPM repetition should apply to the last two tests at the facility, repeats should be randomly selected, and one of the new tasks should be alternate path.	Form ES-301-1 and 2 have been edited to limit repeats from the last 2 exams, to select them randomly, and to require one new alternate path.
41		Ten JPMs (6 simulator, 1-2 in the plant, and 2-3 admin) should be sufficient for RO applicants.	Comment noted. The NRC continues to believe that the larger sample provides a more reliable licensing decision.
42		Clarify whether instant SROs need to be evaluated in the primary RO position and revise Form 301-5 to be usable for instant and upgrade SROs.	The NRC has decided that new ROs and SROs need to be evaluated at the controls, so Section D.5.a has not been changed. Form 301-5 has been completely revised to make it more useable.
43		Clearly state the position rotation requirements for RO applicants.	Section D.5.a has been clarified so every RO has to rotate through the BOP position.
44		Form 301-6 is unnecessary and should be eliminated.	Comment noted. The NRC staff believes that the form adds value because it facilitates the competency review. It has been revised to conform with Form 301-5.
45		Clarify D.4 regarding the use of similar tasks on the simulator and walk-through.	The Section D.4 introductory paragraph has been clarified.
46		Striking out the "not" in D.5.f increases the burden in filling out the D-2 forms; is that what we want?	Section D.5.f was revised to indicate that only key alarms and actions need to be documented on Form D-2.
47	302	Clarify policy on procedure readers during initial exams.	Section D.2.g of ES-302 and D.7 of Appendix E were clarified to prohibit the use of procedure readers.
48		Remove the suggestion that examiners should "agree with" the applicant's actions when acknowledging "peer checks."	This was previously removed from the public version of Draft Rev 9.
49		Delete "or follow-up questions" from D.2.f so applicants are not given the impression that they can correct their performance errors by answering the follow-up questions.	Section D.2.f has been edited as recommended.
50	303	We should not suggest that missing more than one critical task may not result in a simulator test failure.	Section D.2.b, third bullet, was edited to replace the "one or more" with "a" critical task, but this should have no effect on the grading.

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51	303	Better define "non-critical" error or provide examples.	Reference to "non-critical" errors was removed; there are errors and critical errors, both of which need to be considered in the grading process.
52		Delete the note following SRO rating factor 1(c) and score it regardless of board operation.	Section D.2.b, first bullet, and Form 303-4 have been edited as requested.
53		Adjust the rating factor weights so they add up to "1."	Form 303-3, RF 4(a) and Form 303-4, RF 3(a) have been adjusted from 0.33 to 0.34.
54		Add a column to Form 303-1, pages 3(a) and (b), to show the weighting factor used.	The forms have been modified as recommended.
55		Include behavioral anchors that describe the three competence levels.	No change; restoring the behavioral anchors will add confusion and promote inconsistency when the grading process is focused primarily on counting errors committed.
56		Assess whether combining the admin and systems walk-through has an unintended consequence of precluding a failure based solely on the inability to classify an emergency or make a protective action recommendation.	No change. This issue was discussed during the development of R9 and the staff reached consensus that this was an acceptable outcome.
57		The revised grading process puts an added burden on examiners to document non-critical errors and coordinate comments with other examiners.	Comment noted. Section D.3.b of ES-303 has required examiners to briefly document errors that do not contribute to a failure since R8. The burden on examiners has not changed.
58		Add a blank on Forms 303-3 and 4 for the overall competency grade.	Both forms have been revised as recommended and the instructions in Section D.2.b have been edited.
59		The Rev 8 grading process, with behavioral anchors, was less subjective and should be continued. Non-critical errors should not lead to a score of "1" unless they caused significant degradation in safety or mitigation strategy.	Comment noted. The NRC continues to believe that counting errors is more objective than matching behavioral anchors and that all errors that reflect on the applicant's competence should be used to justify a failing grade.
60		Rev 9 does not adequately support analyzing all areas, such as TS; continue the guidance in Rev 8.	ES-301 has been revised to require at least 2 TS evaluations for every SRO applicant.
61		Every SRO applicant needs to be evaluated on at least two TS situations, and the TS rating factors need to be adjusted to reduce fragmentation and emphasize compliance.	Form 301-5 has been revised to require every SRO to perform at least 2 TS evaluations, and Form 303-1 and 4 have been revised to combine the first 2 rating factors for the TS competency and raise the weight of the compliance factor to 0.6.

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Item	ES-#	COMMENT/RECOMMENDATION	PROPOSED RESOLUTION
62	303	The grading instructions need to address single non-critical errors in the absence of any positive performance.	Section D.3.o of ES-302 has been revised to require examiners to run additional scenarios to justify a passing or failing grade. A cautionary note has also been added to Section D.5.d of ES-301.
63		Do the mandatory rating factor designations have any value? If so, the mandatory items do not need to have normalization weighting factors.	The mandatory rating factor designations do not appear to add value to the process and have been deleted.
64		Form ES-301-1 contains Privacy Act information and should be annotated as such.	The top and bottom of all pages of Form ES-303-1 have been annotated.
65	401	Better explain how to construct an SRO-only exam outline; make the notes on Forms 401-1&2 more descriptive.	This comment was addressed in the public version of Draft Rev 9 and was further clarified in the Final document.
66		Do not change the number of Form 401-9.	This comment was addressed in the public version of Draft Rev 9.
67		References provided should not allow applicants to eliminate distractors on other questions.	Section D.2.g has been revised as recommended.
68		Clarify policy regarding K/A mismatches - can the Region keep a good question that does not match the randomly selected K/A?	Section E.2.d has been clarified to require mismatched questions to be replaced regardless of quality.
69		Clarify guidance regarding computerized sample plans.	Section D.1.b has been clarified to preclude double sampling any system before all the systems in the group have been sampled once.
70		Move the condensate system from group 1 to group 2 on the PWR outline.	The system has been moved.
71		Restore the option to propose 10 site-specific priorities, with 7 on the RO and 3 on the SRO exams.	No change. This option was removed to improve consistency and limit potential for bias. Facilities can test priorities during the audit examination. Attachment 1 and Forms 401-1&2 have been revised to add site-specific systems and evolutions that are not on the generic outlines.
72		Clarify D.2.f and Form 401-6, Item 6, to state no more than 75% from the bank, at least 10% new, and the rest new or modified.	Item 6 on Form 401-6 was edited to indicate that the remaining questions would be new or modified.
73		D.1.c, the outline notes, and Attach 2, Item 3, are inconsistent and confusing with regard to SRO-only questions; change Attach 2 to agree with the body of ES-401.	Section D.1.c, Item 3 on Attachment 2, and Form 401-1&2 were edited to be more consistent and eliminate the "K" and "A" categories. Attachment 1 was edited to address the SRO exam.
74		Explain the use of the "#" sign on Forms 401-1, 2, and 3.	Notes (7) and (8) on Forms 401-1 and 2 were clarified to explain the symbol.

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Item	ES-#	COMMENT/RECOMMENDATION	PROPOSED RESOLUTION
75	401	Form 401-9 and E.2.d do not agree with regard to implausible distractors; use E.2.d on the form.	The instructions on Form 401-9 have been clarified to match the intent of Section E.2.d, which was also edited to clarify the distinction between unacceptable questions and others that still need to be repaired. Section D.2.b was edited to highlight the fact that all questions should be <u>free of psychometric flaws</u> .
76		To reduce the risk to content validity from question deletions, shift 2 points from Tier 1 to Tier 2 on the SRO sample plan and require each K/A category to be sampled twice in each tier.	Forms 401-1&2 were revised by lowering the Tier 1 Groups by 1 point each and raising the Tier 2 Groups by 1 point each. The notes were revised to require 2 points per K/A category (except Tier 3).
77		Provide guidance to examiners on expectations regarding checks for question duplication from the last two licensing exams.	Form 401-6, Item 4, was revised to require a review of the sampling process if more than 4 RO and 2 SRO questions are repeated.
78		What importance ratings should be used when developing the RO and SRO-only exams?	Section D.1.b and Forms 401-1&2 were clarified to use RO for RO and SRO for SRO unless only SROs will take the exam.
79		Attachment 2, Item 2, should limit the SRO-only K/A selections to those that are linked to 10 CFR 55.43.	Attachment 2 has been edited as recommended.
80	402	Change the exam time limit back to 4 hours.	No change. The nominal time limits assist in proctor planning and minimize the need for extensions.
81		Clarify guidance to minimize the chances that an applicant will select an inapplicable answer on a machine gradable form.	Section D.1.f was added instructing the proctor to line out the inapplicable column(s).
82		Approve time extensions upon request, define "extenuating circumstances," or eliminate the need for extensions altogether.	This is a power test, so D.4.d was edited to allow the facility licensee to notify the NRC if an extension is necessary and when the examination is complete.
83	501	Upgrade SROs should not be allowed to take the 25 question exam as a matter of routine and the passing grade should be 70%.	No change. Taking the shorter exam, with a higher cut score, is voluntary; an exam with more questions provides more confidence and can justify the lower score, while the exam with fewer questions provides less confidence, thereby justifying a higher cut score; there is historical precedent for the change; IOHS does not desire to get involved in special reviews.

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Item	ES-#	COMMENT/RECOMMENDATION	PROPOSED RESOLUTION
84		Require an 80% grade on the SRO-only questions for upgrade applicants that take the full exam.	No change. This was considered and rejected while developing draft Revision 9.
85	501	Section E.4.b requires upgrade applicants to be remediated if they score below 80% on the RO examination; instant SROs should be subject to the same guidance.	Section E.4 has been revised to apply this policy to all SRO applicants who pass overall but score below 80% on either part of the written exam.
86		Clarify limits on reactivating an RO license while awaiting upgrade.	Section E.4.a was revised to include the clarifications that were previously posted on the web site.
87		Clarify denial letters to cover three operating test sections.	Attachment 4 was revised to better reflect the multi-part written examinations and operating tests.
88		Change C.2.c (2 nd and 3 rd para) from 5% to an actual number, preferably 5 on the RO exam and 2 on the SRO-only.	Section C.2.c has been revised to use numbers (4 and 2 in the first case, 7 and 2 in the second) rather than percentages.
89		Clarify that SRO grades on the RO portion of the written exam should be entered on Forms 303-1, 401-7/8, and 501-2.	Sections D.2.e and g have been edited to record all grades.
90		Incorporate thresholds for documenting security issues in the exam report.	Section E.3.a, fourth bullet, was revised to include examples of issues that would generally be documented in the examination report.
91		When documenting exam quality, should the RO and SRO written exam thresholds be considered separately?	Yes. Section E.3.a has been revised to note that the RO and SRO written exams will be considered separately with respect to the 20% comment threshold.
92		Post-examination changes and deletions should be considered when evaluating written examination quality in the report. Moreover, licensees have been preparing exams long enough that they should not be given a second "free" unsatisfactory exam before it gets documented in the report.	Sections C.2.c and E.3.a have been revised to ensure that post exam changes are also counted when evaluating exam quality. The last paragraph under the first bullet has been revised to eliminate the second free unsatisfactory provision.
93		Attachment 5, the notification letter, should be revised so it does not tell the applicants that they passed and to cover medical holds.	Attachment 5 has been revised as recommended.
94		502	Facility licensees should be expected to agree or disagree with applicant appeal comments.
95	The guidance needs to clarify how multiple written appeals and generic findings will affect each appellant's grade.		Section D.2.a was revised to address these situations.

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96	601	Change C (2 nd para) to state that the licensee's exam structure will be used unless it does not comply with Part 55.	No change. An informal poll of the Regions suggests about 25% of licensees still use the static exam, which the NRC believes to have high operational validity. The existing language provides sufficient flexibility to omit the static examination if it is inappropriate for the circumstances.
97		Update Form 601-1 to parallel Form 201-3.	Form 601-1 has been updated to parallel Form 201-3.
98	605	Add previous guidance regarding license downgrade requests.	New Section C.4 has been added to provide guidance to the regions on how to process facility requests to permanently downgrade an SRO to an RO license.
99		Add guidance regarding no-solo and other medical license restrictions.	Section C.3 has been expanded to more thoroughly address medical license restrictions and conditions.
100		Does a newly-licensed operator have to take the annual operating test and biennial comprehensive written examination if they are given shortly after initial licensing?	Section C.1.b has been added to clarify that new operators would be expected to take tests and exams given one or more cycles after they enter the requal training program.
101		The LSRO license reactivation guidance issued as an FAQ should be added to the NUREG.	Section C.2.b has been added to incorporate the guidance in FAQ #8 under ES-605.
102		The FAQ guidance on requalification exam cycles should be added to the NUREG.	Section C.1.a has been added to incorporate the guidance in FAQ #12 under IP-71111.11.
103	701	Given the number of LSRO responsibilities and repetition limits, 10 JPMs, with 4 admin, 4 systems, and 2 E/APEs, should be sufficient for the operating test.	Agreed; the length of the operating test has been revised, but the distribution will be 3 admin, 4 systems, and 3 E/APE tasks.
104		The limited number of K/As available makes it impractical to generate a random outline using the 2 groups/tier structure. Keep the previous structure with combined HP and GFE sections, or keep the tiers with no groups.	Forms 701-1 and 2 have been revised by combining the groups within Tiers 1 and 2.
105		Make the written exam 35 points overall, with 5 in Tier 1, 20 in Tier 2, and 5 in Tier 3 [Note that these do not add up.]	Five questions is insufficient sampling for Tiers 1 and 3. Forms 701-1 and 2 were revised to require 40 questions overall, with 10 in Tiers 1 and 3, and 20 in Tier 2.
106	App. A	Clarify the discussion of level of knowledge and difficulty.	A new section (C.3.c) was added to clarify these concepts.
107	App. B	Add a caution regarding the use of double-distractor-set questions.	A caution has been added to Section C.2.a to ensure that the distractors are plausible.

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108	App. B	Is it acceptable to reference the procedure number and title in the stem of the question?	Section C.1.c has been revised to indicate that it is acceptable for closed reference questions; use caution on open reference questions.
109	App. E	Caution applicants that written questions have only 4 choices even if the answer sheet has 5.	A caution was added to Item B.6.
110		Inform applicants that asking the proctor to clarify confusing questions (including the definition of terms) will improve their chances of a successful appeal.	Instruction B.7 was revised to inform applicants that their questions are taken into consideration during grading and appeals.
111		Revise B.4 to require facility licensees to provide access to a dictionary during the written exam.	Section C.1.e of ES-402 was revised to require a dictionary and Instruction B.7 was revised to note that a dictionary is available if needed.
112		Reconsider the policy restricting applicants from discussing JPMs if they have all completed them.	Item C.4 has been revised to prohibit discussions with other applicants who have not completed that portion of the operating test.
113	App. F	Add a definition of "low power."	A definition was added here, and a footnote was added to Section D.4.b of ES-301 referencing NUREG-1449, which defines it as 5% or less.