

## REGIONAL OFFICE VISIT PROCEDURE

### A. Purpose

To establish a procedure and criteria to review the administration of the operator licensing functions in the Regional Offices and to review Operator Licensing and Training Branch (IOLB) support of the Regional Offices in carrying out the operator licensing functions delegated to the Regions.

### B. Background

1. NRR is responsible for regulatory policy and the licensing of operators pursuant to 10 CFR Part 55. To monitor the execution of this responsibility, IOLB shall oversee the operator licensing functions delegated to the Regional Offices. The oversight function will include a biennial office visit conducted in accordance with the procedures of this manual chapter.
2. The objectives of the office visit include:
  - a. Evaluating Regional consistency in implementing the regulations, Examination Standards, and other policy guidance. Consistency is evaluated by assessing examination administration, quality, level of difficulty, and grading.
  - b. Providing feedback to NRR management concerning the adequacy of the operator licensing functions delegated to the Regional Offices.
  - c. Evaluating examiner feedback and the responsiveness of IOLB to that feedback along with any other problems identified based on observations and interactions.
  - d. Determining the adequacy of IOLB support provided to the Regional Offices to carry out their functions.
  - e. Ensure licensing decisions are correct and not adversely affected by any regional process errors.
3. A detailed review of all functional areas or all aspects of a function is not required each visit. Items of particular interest for review shall be those identified problem areas from previous reviews.
4. The Operator Licensing Manual Chapters (OLMCs) document the criteria and methodology to evaluate the administration of the operator licensing functions in the Regional Offices. This ensures consistent operator licensing program administration in accordance with the latest revision of the Operator Licensing Examination Standards for Power Reactors (NUREG-1021) and other policy directives such as approved Reports on Interaction (ROI) or Frequently Asked Questions (FAQs). On-site or in-office examination audits will be performed in accordance with OLMC-320.

### C. Implementation Procedure

1. The regional operator licensing program review will consist of a biennial Regional Office visit and one or more on-site or in-office examination audits. The office visit Team Leader shall contact the appropriate Regional Branch Chief to arrange

an optimal time for the office visit. The date of the office visit should be selected to coincide with a time when most examiners are in the office and available for interviews. In addition, the visit should be scheduled such that an NRR Program Office manager will be available to participate in the exit briefing. After the visit has been arranged verbally, and approximately thirty days prior to the scheduled date of the visit, a memorandum in the format of Attachment 1 should be sent to the Regional Office being visited.

2. The office visit shall evaluate the administration of delegated operator licensing functions within the Region (using the assessment guidance in Attachment 2) and the support and guidance provided to the Regional Offices by IOLB. The assessment of many of the elements that make up the regional operator licensing functions will be both objective and subjective in nature. For those licensing functions, where definitive requirements have been previously established, the ratings will be based on objective measurements of performance against those requirements. The specific ratings are defined as follows:

SATISFACTORY (S):

- Goals and requirements are consistently met or exceeded.
- Schedules are realistic and consistently met.
- Initiatives are implemented with positive results.

NEEDS IMPROVEMENT (NI):

- Goals and requirements are consistently not met.
- Schedules are frequently not met.
- Regional management attention is warranted.
- Potential vulnerability or deficiency.

NOT APPLICABLE (NA):

- Not applicable or not evaluated.

3. Additional reviews may be scheduled if necessary to meet the objectives of the review program. However, a region should receive no more than one office visit in any fiscal year unless unforeseen or special circumstances arise. If an additional office review is necessary then the NRR Program Office will document the circumstances requiring the additional visit in the associated biennial operator licensing program review.
4. The office visit will be performed by a team consisting of the necessary expertise to adequately evaluate the areas assigned by the NRR Program Office. The review of examination material will be performed by certified examiners. Whenever possible, the team will include an experienced examiner from another Regional Office and an operator licensing assistant (OLA) from IOLB or another Regional Office. The Team Leader will generally be a senior license examiner from IOLB.
5. An exit meeting shall be scheduled at the end of the office visit to discuss the findings of the review team and any concerns of the Regional Office. Prior to the exit meeting, the office visit Team Leader will discuss the team's findings with the appropriate Regional management. The NRR Program Office manager should join the office visit team to interview Regional staff, attend the exit meeting, and discuss any policy matters with Regional Office management. Regional staff

may attend the exit meeting at Regional Office management discretion.

6. Assessment Areas

A detailed review of each of the following assessment areas or all aspects of an assessment area is not required during each office visit. Identified problem areas from previous reviews and on-site audits are generally of particular interest.

- a. The Examination Administrative Requirements Assessment (Attachment 2 Section 1.0) shall be completed in conjunction with the Written and Operating Test examination packages selected for review.
- b. The Operating and Written Examination Assessments (Attachment 2 Sections 2.0 and 3.0) should be used to review selected portions of examination packages. Since each Regional Office is responsible for quality assurance of all examinations, no distinction shall be made between examinations written by the NRC or by the facility licensee. The examination package shall be reviewed for compliance with the applicable revision of the Examination Standards.
- c. The Operator Requalification Program Assessment (Attachment 2 Section 4.0) should be used to review one or two requalification program examinations or inspections, as applicable.
- d. The Regional Operations Assessment (Attachment 2 Section 5.0) should be used to review the Region's method of disseminating guidance from the NRR Program Office, scheduling examinations, handling waiver requests, reviewing medical evaluation forms, processing license denial appeals, docket management, and Operator Licensing Tracking System (OLTS) entries. There should be a means to ensure that all examiners receive clarification or interpretations of established policy or the Examination Standards.
- e. The Resource Utilization Assessment (Attachment 2 Section 6.0) should be used to assess the effectiveness of the Regional Offices' examiner training program and the efficiency of examiner resource utilization.

7. General Implementation Guidance

- a. The Team Leader should prepare a review plan and assign the assessment areas among the team members based on their experience and expertise.
- b. The Team Leader should have the IOLB OLA run the following reports, as applicable, covering the period since the last office review in the Regional Office and distribute them to the appropriate team members to facilitate the review:
  - OLTS Report 14, "License Restriction Report"
  - OLTS Report 18, "Proposed Denials / Appeals Status"
  - OLTS Report 19, "Waiver Tracking Report"
  - OLTS Report 25, "Fitness for Duty Report"
  - RPS PM Report 3, "Completion Status and Hours by Inspection Procedure," for IP-71111.11B and Q
  - ROP Inspection Findings Summary from the NRR Dynamic Web

Page (found at [http://nrr10.nrc.gov/rps/dyn/rop\\_ir1\\_select.cfm](http://nrr10.nrc.gov/rps/dyn/rop_ir1_select.cfm))

- Hours charged to Operator Licensing PA Codes 111108 and 111110 from the NRR Dynamic Web Page (found at [http://nrr10.nrc.gov/nrr-office/rps/dyn/rits3a\\_select.cfm](http://nrr10.nrc.gov/nrr-office/rps/dyn/rits3a_select.cfm))
- Any examination audit reports
- Regional operator licensing self assessment reports

The Team Leader should also distribute to the team members the previous IOLB Regional Office Visit Report.

- c. Some portion of the reviews should be performed prior to the arrival of the review team at the Regional Office so that the time spent at the Regional Office can be spent more efficiently.

D. Documentation Required

A report shall be prepared by the Team Leader upon completion of the office visit. This report shall summarize the findings of the assessment team regarding the adequacy and consistency of program implementation by the Regional Office and any areas where the program office can provide additional support for the Regional Office. The report shall be from the Director, Division of Inspection and Regional Support (DIRS) to the appropriate Regional Division Director and other appropriate Regional Office personnel. Prior to final distribution of the report, a preliminary copy should be sent to the Regional Office for review and comment. The Regional Office's comments will be considered for inclusion in the final report.

ATTACHMENT 1

EXAMPLE OF LETTER TO REGION SCHEDULING BIENNIAL OFFICE REVIEW

MEMORANDUM TO: (\_\_\_NAME\_\_\_), Director  
Division of Reactor Safety, R(\_\_\_)

FROM: (NAME), Director  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

SUBJECT: BIENNIAL PROGRAM REVIEW OF THE OPERATOR LICENSING  
FUNCTION IN REGION (\_\_\_)

The Operator Licensing and Training Branch (IOLB) is planning to perform its biennial Region (\_\_\_) office review during the week of (\_\_\_DATE\_\_\_). (\_\_\_NAME\_\_\_) of IOLB has discussed this visit with (\_\_\_REGION CONTACT\_\_\_) of your staff and confirmed the dates. (\_\_\_REGION CONTACT\_\_\_) has also agreed to arrange for working space for the review team. (\_\_\_TEAM LEADER\_\_\_) will lead the team consisting of himself, (\_\_\_LIST HQ TEAM MEMBERS\_\_\_) IOLB, and (\_\_\_NAME OF REGIONAL EXAMINER\_\_\_) from Region (\_\_\_).

Enclosed for your information is the planned agenda for this review. (\_\_\_NAME AND TITLE\_\_\_) will be the NRR management representative and will discuss the operator licensing programs with you and your staff, review the team's findings, and participate in the exit briefing.

We appreciate the cooperation of you and your staff for this review. I believe that the success of this important review function depends on a high level of regional office cooperation. If you or your staff have any questions pertaining to this review, please call me or [NAME], Chief, IOLB, at (301) 415-1004 or (301) 415-[ # ], respectively.

Attachment:  
As stated

Distribution:  
Regional BC (\_\_\_NAME\_\_\_)  
IOLB LA Regional LA  
Team Members  
IOLB R/F

Concurrence: Team Leader, IOLB BC, DIRS DD

**SAMPLE AGENDA**

- DAY ONE** Assemble and brief team on schedule for visit (TEAM LEADER)  
Brief Region (\_\_\_\_) management and staff on schedule for visit (TEAM LEADER)  
Begin Assessment of Regional Operator Licensing Activities (TEAM)
- DAY TWO** Continue Assessment of Operator Licensing Activities (TEAM)  
Meet with Regional Operator Licensing Staff to discuss recent IOLB activities and answer questions (TEAM LEADER/MANAGER)
- DAY THREE** Continue Assessment of Regional Operator Licensing Activities (TEAM)  
Continue meeting with Regional Operator Licensing Staff to discuss recent IOLB activities and answer questions (TEAM LEADER/MANAGER)  
Brief NRR manager on team findings (TEAM)
- DAY FOUR** Prepare exit meeting summary (TEAM)  
Exit meeting with Regional Office Management (TEAM)

**ENCLOSURE**

ATTACHMENT 2

ASSESSMENT OF THE REGIONAL OPERATOR LICENSING PROGRAM

ASSESSMENT SUMMARY SHEET

1.0	<u>EXAMINATION ADMINISTRATIVE REQUIREMENTS ASSESSMENT</u>	S/NI/NA
2.0	<u>OPERATING TEST ASSESSMENT</u>	S/NI/NA
3.0	<u>WRITTEN EXAMINATION ASSESSMENT</u>	S/NI/NA
4.0	<u>OPERATOR REQUALIFICATION PROGRAM ASSESSMENT</u>	S/NI/NA
5.0	<u>REGIONAL OPERATIONS ASSESSMENT</u>	S/NI/NA
6.0	<u>RESOURCE UTILIZATION ASSESSMENT</u>	S/NI/NA
7.0	<u>REGIONAL AND PROGRAM OFFICE COMMUNICATIONS</u>	S/NI/NA

DEFINITIONS OF ASSESSMENT RATINGS

SATISFACTORY (S):

- Goals and requirements are consistently met or exceeded.
- Schedules are consistently met.
- Initiatives are implemented with positive results.

NEEDS IMPROVEMENT (NI):

- Goals and requirements are consistently not met.
- Schedules are frequently not met.
- Regional management attention is warranted.
- Potential vulnerability or deficiency.

NOT APPLICABLE (NA):

- Not applicable or not evaluated.

ASSESSMENT OF THE REGIONAL OPERATOR LICENSING PROGRAM

1.0 EXAMINATION ADMINISTRATIVE REQUIREMENTS ASSESSMENT

Examinations assessed: \_\_\_\_\_

- 1.1 Pre- and Post-Examination Security Agreements were executed in accordance with the Examination Standards. (ES-201, Section D.2.b; Form ES-201-3)

Comments:

- 1.2 License applications (NRC Form 398) were reviewed for completeness and accuracy and signed by the examiner. (ES-202, Section C.2)

Comments:

- 1.3 A Facility Examination File (in paper or ADAMS) exists for each facility, containing the following information for the last two examinations administered:

1.1.3.1 Pertinent written correspondence, checklists, and forms listed in ES-501, Section F.1 are included.

Comments:

- 1.4 Examination results notification was performed in accordance with ES-501, Section E.1.

Comments:

- 1.5 The Examination Report was prepared in accordance with ES-501, Section E.3.

Comments:



## 2.0 OPERATING TEST ASSESSMENT

Examinations assessed: \_\_\_\_\_

### 2.1 **Adequacy of the facility walk-through portions of initial examination operating tests**

2.1.1 The facility walk-through test complies with ES-301 (use Forms ES-301-1, 2, and 3 as guides). Pre-reviews were conducted in accordance with ES-201, Sections C.3.e, f, and g and ES-301, Section E.2. Any comments (if available) were properly resolved and the final examination was revised, as necessary, prior to regional supervisor approval.

Comments:

2.1.2 The facility walk-through appears to be an appropriate test of system knowledge. (Evaluate only if JPMs are available.)

Comments:

### 2.2 **Adequacy of the integrated plant operations portions of initial examination operating tests**

2.2.1 The simulator scenarios comply with ES-301 (use Form ES-301-4 as a guide). Pre-reviews were conducted in accordance with ES-201, Sections C.3.e, f, and g and ES-301, Section E.2. Any comments (if available) were properly resolved and the final examination was revised, as necessary, prior to regional supervisor approval.

Comments:

2.2.2 The simulator scenarios appear to be an appropriate test of integrated plant operations.

Comments:

### 2.3 **Examination Record Retention**

2.3.1 Sample 2-3 individual docket files, including those of any operator who failed the exam, to ensure the files contain the following:

2.3.1.1 Examination Reports (Forms ES-303-1, ES-303-2, as-run ES-D-1) for each operator, along with all correspondence with the applicant. (ES-501, Section F.2)

Comments:

2.3.1.2 For any operator who failed the exam, docket file contains all failed portions of the exam and Form ES-D-2, in addition to the forms identified in item 2.3.1.1 (ES-501, Section F.2). Verify that the operating test comments justify the grades assigned per ES-303.

Comments:

2.3.2 The Facility Examination File contains the as-run Forms for each scenario set (ES-D-1 and D-2) and operating test outlines (ES-301-1 and 301-2) administered during the last two examinations at the facility.

Comments:

3.0 WRITTEN EXAMINATION ASSESSMENT

Examinations assessed: \_\_\_\_\_

3.1 **Adequacy of the written examination reviews**

3.1.1 Pre-examination reviews were conducted in accordance with ES-201, Sections C.3.e, f, and g and ES-401, Section E.2. Any comments (if available) were properly resolved and the final examination was revised, as necessary, prior to regional supervisor approval.

Comments:

3.1.2 Any changes to examination grading are fully documented by the reviewer with original grading lined out but legible (no white out or other obscuring methods used). (ES-403, D.2)

Comments:

3.1.3 Perform an independent review on a sample (~25%) of the written examination questions using Forms ES-401-6 and ES-401-9. The independent written examination review agrees with the region's Forms ES-401-6 and ES-401-9. Review ES 401-9 Forms associated with different exams and document any significant inconsistencies.

Comments:

3.2 **Examination Record Retention**

The Facility Examination File contains the following information for the last two examinations administered:

3.2.1 The final written examination and answer key with all changes incorporated, and the NRC-approved examination that was pre-reviewed by the facility licensee (including licensee comments) or the draft examination submitted by the facility licensee for NRC review.

Comments:

3.2.2 Signed Quality Assurance Forms (ES-401-6 and 403-1)

Comments:

4.0 OPERATOR REQUALIFICATION PROGRAM ASSESSMENT

Inspections assessed: \_\_\_\_\_

4.1 Requalification program inspections conducted in accordance with IP 71111.11B once per requalification cycle. Additionally, resident inspectors perform quarterly inspections in accordance with IP 71111.11Q.

Comments:

4.2 The Regional Office announces its intent to conduct inspections.

Comments:

4.3 Requests for the facility licensee to submit specific examinations in advance are made in writing (see ROI 94-08).

Comments:

4.4 How many inspectors are typically dispatched to the site? How long are the inspectors at the site? How many DIE hours have been required to complete the inspections (the IP estimates 96 hrs DIE with an additional 4 hours per quarter for resident staff to review requalification activities)? (Refer to RPS PM Report 3)

Comments:

4.5 What fraction of the inspection requirements were completed during the inspections under review? How were the inspection requirements prioritized? Are requirements 1 - 3 accomplished first?

Comments:

4.6 Is there any evidence that the Examination Standards are being treated as requirements (see ROI-94-29)?

Comments:

4.7 Are inspection findings (refer to the NRR Dynamic Webpage ROP report) well-supported and consistent with IOLB guidance? Are conclusions reasonable and based on facts discussed in the report?

Comments:

4.8 Are the NRC inspectors qualified to perform the inspection?

Comments:

5.0 REGIONAL OPERATIONS ASSESSMENT

5.1 **Region/Headquarters Interactions**

5.1.1 What method is used to disseminate information to both part-time and full-time examiners (e.g., ROIs, Conference call notes, appeal results, manual chapter changes)?

Comments:

5.1.2 If Regional OLAs are not maintaining an updated file (hardcopy) for ROIs, then verify examiners are capable of accessing the ADAMS document file for ROIs. (This is required by OLMC-160, Regional Office Interactions)

Comments:

5.1.3 Summarize Regional views on level of IOLB support and timeliness of response to requests for support. Include any planned or completed actions taken to address Regional comments.

Comments:

5.2 **Waivers**

5.2.1 Using OLTS report 19, determine how many applications requested waivers during the review period. \_\_\_\_\_

5.2.2 Does the Regional Offices' resolution of waivers conform to NRC policy (ES-204, C.2)?

Comments:

5.2.3 Using OLTS Report 19, verify that a sample of the waiver decisions are documented on NRC form 398 (ES-204, C.2.e) and in correspondence to the applicant (ES-204, C.2.d).

Comments:

5.3 **Review of medical examinations**

5.3.1 Does the Region have an effective medical examination tracking system to monitor the status and location of medical reviews?

Comments:

5.3.2 Select several dockets to ensure NRC Form 396 and, if appropriate, the NRC doctor's review are filed in each docket.

Comments:

5.3.3 Verify that only current medical examinations have been accepted. (ES-202, Sections C.1.a and C.2.a; ES-204, Section D.1.c; ES-605, Section C.3)

Comments:

5.3.4 Using OLTS Report 14, check several dockets for which the medical evaluations require license restrictions. Are the restrictions stated on the license?

Comments:

5.3.5 Using OLTS Report 25, verify that any fitness for duty cases are fully documented in the individual docket file(s).

Comments:

#### 5.4 License denial and appeal process

5.4.1 Number of failures overturned -

5.4.1.1 by the Regional Office: \_\_\_\_\_

5.4.1.2 by IOLB: \_\_\_\_\_

5.4.2 Should the Regional Office reasonably have been expected to identify and correct the flawed test items prior to examination administration or during the grading process?

Comments:

5.4.3 Did the Region support the appeal process in accordance with ES-502 or ES-605, as applicable?

Comments:

5.4.4 Using OLTS Report 18, verify that any appellants' docket files include documentation from DIRS on the appeal results.

Comments:

5.4.5 For any appeal that resulted in examination grading changes, confirm that the data in OLTS was updated, as required.

Comments:

#### 5.5 Docket Management and Office Procedures

5.5.1 Applications are logged in as received.

Comments:

5.5.2 Applications are processed within 30 days of receipt.

Comments:

5.5.3 Docket files are maintained up to date.

Comments:

5.5.4 Facility Examination Files are being maintained.

Comments:

- 5.5.5 Docket security is designed and maintained to ensure the privacy of applicants.

Comments:

- 5.5.6 The docket locator system provides for the capability to track the physical location of dockets at all times.

Comments:

- 5.5.7 Completeness of facility Examination File contents verified by a random sample of facility files for completeness required per ES-501, Section F.1.

Comments:

- 5.5.8 Completeness of docket file contents verified by a random sample of docket files for completeness required per ES-501, Section F.2. Track a minimum of one application through the complete process from date of receipt to issuance of license or denial.

Comments:

- 5.5.9 License Logs are complete and up to date.

Comments:

## 5.6 **Status of OLTS Entries/Licensing Assistant Interaction with OLTS**

- 5.6.1 OLTS entries are up to date within one week of the review date.

Comments:

- 5.6.2 Were any errors found during a comparison of a random sample of dockets with their OLTS entries?

Comments:

- 5.6.3 Document any notable problems experienced with OLTS after the last Regional office assessment and convey any recent OLTS developments to the Licensing Assistant.

Comments:

- 5.6.4 Convey any recent OLTS developments to the Licensing Assistant.

Comments:

## 6.0 **RESOURCE UTILIZATION ASSESSMENT**

### 6.1 **Examiner training and development**

- 6.1.1 Is the training program implemented for new examiners? (Inspection Manual Chapter 1245, Appendix C-10).

Comments:

- 6.1.2 Perform a sample review of new examiner training journals to determine compliance with Appendix C-10 of MC-1245.

Comments:

- 6.1.3 Has each examiner been audited during an operating test or inspection on an annual basis in accordance with Inspection Manual Chapter 0102? Are the exam audits adequately documented?

Comments:

- 6.1.4 Has each examiner attended a reactor technology and an examination techniques refresher training course at 3-(calendar) year intervals (MC-1245, Appendix D-1)?

Comments:

- 6.1.5 Has each examiner maintained proficiency by administering one complete operating test per calendar year (MC-1245, Appendix D-1)?

Comments:

- 6.1.6 Number of examiners cross-qualified as reactor inspectors and expected completion dates for cross qualification of all current staff members:

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## 6.2 **Staff Utilization**

- 6.2.1 Did the Regional office staff participate in meetings with utility training staffs other than routine meetings associated with specific examination assignments?

Comments:

- 6.2.2 Did the Regional office staff attend training conferences and workshops held by utility organizations (e.g., Mid-Atlantic Nuclear Training Group)?

Comments:

- 6.2.3 Review printouts of examiner time usage and evaluate appropriateness of charged time for examinations and requalification program inspections.

Comments:

- 6.2.4 Did the Regional staff adequately support the National Examiners' Conference?

Comments:

## 7.0 REGIONAL AND PROGRAM OFFICE COMMUNICATIONS

### 7.1 **Feedback from Regions**

- 7.1.1 Regional Office staff, other than the Branch Chief, regularly participates in the bi-weekly phone call with the Program Office.

Comments:

- 7.1.2 All Regional Office staff has access to ADAMS folders that retain copies of all ROIs.

Comments:

- 7.1.3 Regional Office Branch Chiefs participate in the annual counterpart meeting.

Comments:

- 7.1.4 Operator Licensing Program Office Branch Chief has visited the Regional Office since the last Regional Office review.

Comments: