

Director, Division of Inspection and Regional Support
Office of the Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

To whom it may concern,

The purpose of this package is to request a NRC staff review of the grading of my examination that was evaluated on the weeks of March 26, 2012 and April 9, 2012. The U.S. Nuclear Regulatory Commission, Region II, determined that I did not pass the simulator portion of the operating test. This is the second attempt to apply for a senior reactor operator license. It is unclear to the applicant why I was required to retake the operating test. The applicant passed the previous years' simulator test with some margin and scored 100% (pass) on the JPM portion, (see results). Another applicant passed the JPM portion with the minimum score and was granted a waiver. It is understood that a waiver is granted on a case by case basis. If the intent was to deny the waiver then the applicant should have the opportunity to formally submit a waiver for review. If the regional office decides to deny the waiver then per ES-204, Page 2 of 7: "the regional office shall promptly notify the applicant in writing concerning the disposition of the request, and provide an explanation for the denial." Unfortunately this did not occur, The NRC examiners on the current examination team (to include the operating test examiner) were consulted and they strongly discouraged the submittal of a waiver of the operating exam on my behalf. In addition, two of the three examiners were a part of the evaluation team from Hot License 16 examination. I was the only applicant that was re-evaluated from Hot License 16. I did not have the benefit of starting with a clean slate or without preconceived expectations, like the other applicants, and therefore was held to a different standard. This familiarity may have led to my exam being graded too severely.

In addition, the overall exam results are not consistent. The applicant received a score of 3.0 in the areas of Procedure Usage and Directing Operations but received a 1.70 in Interpretation/Diagnosis and a 1.2 in Communication. These areas have a direct impact on the success path for Procedure usage and Directing Operations. In reviewing the comments there were instances where pertinent information was not included in the description of the assessment, allowing the competencies to be downgraded. How is the crew able to be successful when all directions are taken from the Shift Supervisor (role) and requires that individual to be able to interpret, diagnose and communicate to navigate through the various procedures?

in my own personal experience, i felt that the current examination was graded at a much higher level. The applicant had strong results on the rest of the licensing exam to support being successful on this simulator exam (See Exam Chart – for results and grading criteria that was used). The crew performed all critical steps, procedure transition, protected all vital equipment and no actions compromised the health and safety of the public. Several comments that were identified were non consequential, and minimal in nature. NUREG 1021, ES-303, page 7 of 19; step 3b. Identifies how the evaluator is expected to justify in detail Operating Test Comments “every knowledge or ability deficiency that contributed to a failure in any part of the operating test. Provide the specific information, as applicable.” One of the bullets states: “the potential or actual consequences of the applicant’s incorrect action (particularly if the examiner recommends a failure based on a **serious** error that would not normally result in a failing grade.” Why are so many items identified that do not have consequences? The basis for some of the comments, were that the applicant didn’t make a “recommendation”?

I would also like to request that the review team separately evaluate the validity of the communication comments, with an emphasis on if the comments are realistic and was the same standard applied to all applicants that were evaluated in the simulator. Each scenario requires an extensive amount of communications, is it realistic that no other applicant made the same types of communication errors and if they did, were they all evaluated in the same manner? Typically poor communication is indicative of missed critical steps, diagnosis errors and incorrect procedure direction. Some examples of the communication errors that were identified are as follows:

1. Not repeating back a portion of a statement - Evaluator identifies the applicant doesn’t repeat back that the “alarms are consistent with the failure” although it has already been identified that the pump tripped.
2. Not requesting permission from the Shift Manager to place a component back to automatic. Two comments were identified in this area and in each comment it states that the applicant **directed/instructed** the Operator to place a component back in automatic. Each time the crew corrected and ensured that the SM was notified (No actions were performed).