

December 24, 2014

MEMORANDUM TO: Scott Morris, Director  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

FROM: Timothy Kolb, Senior Reactor Engineer **/RA/**  
Operator Licensing and Training Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

SUBJECT: OPERATOR LICENSING IMPLEMENTATION TEAM ACTION PLAN

The Operator Licensing Implementation Team (OLIT) sequestered in Atlanta the week of November 17 - 21, 2014, to determine the necessary actions going forward to address the recommendations provided by the Lessons Learned Review Team (LLRT) (ADAMS document No. ML14308A638). The LLRT was formed to assess the issues that contributed to the March 18, 2014, ASLB decision overturning the Staff's denial of a senior reactor operator license for an applicant from the Vogtle Electric Generating Plant. The OLIT was provided a charter (ADAMS document No. ML14314A036) that directed a review of the LLRT report, a determination of the extent to which each recommendation would affect the NRC's Operator Licensing Program, and the development of an action plan for each of the LLRT recommendations, including any barriers to implementation. The OLIT completed the work identified in its charter and developed an Action Plan that includes five Specific Issue Teams (SIT), each assigned associated actions that were created from the review of each LLRT recommendation. Each SIT Action Plan identifies actions that are necessary to support the decision of the OLIT in its review of the LLRT recommendations and their affect on the NRC's Operator Licensing Program. To ensure consistency, continuity, and regional buy-in, each SIT Team Leader was a participating member of the OLIT. Additionally, as the SITs work toward their objectives, team members will continue to solicit ideas from interested parties to achieve the best possible implementation solution.

Attached you will find the OLIT Action Plan for implementation of all the recommendations that were provided from the LLRT. However, the OLIT determined that four LLRT recommendations should be revised to some extent, resulting in more consistent, justifiable and fair results within the Operator Licensing Program.

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The five Specific Issue Teams each focus on a specific area, with Team 2, NUREG 1021, responsible for coordinating all other team inputs for the proposed NUREG 1021, Rev.11. Finally, taking into account regional examination schedules, a timetable was established with a due date of May 1, 2015, to have all proposed changes provided to Team 2 for development of a draft version of NUREG 1021, Rev.11.

Enclosures:

1. Summary of LLRT Recommendations with OLIT Plan
2. OLIT Special Issue Team Action Plan Timeline
3. Special Issue Teams

The five Specific Issue Teams each focus on a specific area, with Team 2, NUREG 1021, responsible for coordinating all other team inputs for the proposed NUREG 1021, Rev.11. Finally, taking into account regional examination schedules, a timetable was established with a due date of May 1, 2015, to have all proposed changes provided to Team 2 for development of a draft version of NUREG 1021, Rev.11.

## Enclosures:

1. Summary of LLRT Recommendations with OLIT Plan
2. OLIT Special Issue Team Action Plan Timeline
3. Special Issue Teams

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**Accession Number: ML15126A138**

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**Objective:** Review the Operator Licensing Lessons Learned Review Team (LLRT) report, determine the extent to which each recommendation will affect the NRC's Operator Licensing Program, and plan an effective course of action for implementation, including any potential barriers.

**Scope:** Review and understand the basis for LLRT recommendations with the goal of implementing all recommendations. The OLIT should categorize recommendations into similar or related topics and designate Specific Issue Teams to resolve recommendations in a structured manner. When determining courses of action, the OLIT should leverage ongoing efforts within the Operator Licensing program. An integrated action plan should be developed that includes a prioritized resolution of all recommendations, including any changes that are identified.

**Team Members:**

Tim Kolb – HQ	Dan Bacon – Region II
Joe DeMarshall - NRO	Chuck Zoia – Region III
Manan Patel – Region I	Brian Larson – Region IV

**Notes:** Enclosure 1 shows how each LLRT recommendation (paraphrased) was dispositioned by the OLIT. Specific Issue Teams (SITs) were created to implement a group of related recommendations, and have been identified as well in the table. Enclosure 2 provides the overall Action Plan timeline. Enclosure 3 provides each SIT's assigned recommendations and tasks. To the extent possible, regional and headquarters personnel have been identified to staff the SITs. Each SIT's Team Leader has provided an initial, rough estimate of man-hours required to implement the assigned tasks, with the exception of Team 2 (each NUREG change is unique and the scope of each change is unknown).

All implemented recommendations will require some Examiner training or communication of the change. However, training that is recommended as part of a structured course will be forwarded to TTC.

**Changes to LLRT Recommendations:**

- For the Communication Competency, a missed Critical Task should result in a 2 point deduction, not a 1 point deduction (Recommendation 1.2).
- Appeal Panels should not be prohibited from identifying a post-exam Critical Task (Recommendation 1.3).
- Dynamic scenario exam performance deficiencies should not be limited to two rating factors (Recommendation 1.5).
- Marginal performance band concept should NOT apply to the written exam. However, if it is determined that a band is required, then an 80-82 band should be established for the written exam (with additional guidance established for the SRO-only written exam) (Recommendation 2.2).

NOTE: Initial justification for each of the above changes is documented in the specific recommendation in Enclosure 1.

**Additional Recommendations:** Suggestions which are outside the scope of the charter but would support the implementation of some recommendations:

Consider unifying job aids to improve regional consistency (i.e., desktop guides, Chief Examiner handbook, Lessons Learned handbook, etc.)

Consider reviewing/updating LIC-201 that deals with NRR support of the hearing process. Must be coordinated with OGC since they have their own process for conducting hearings.

There are additional NUREG 1021 changes that need to get incorporated as a result of the OGC review that was conducted for the NUREG 1021, Rev.10 change. All specific issue teams shall consider these OGC comments when revising their sections of the NUREG for impact to their recommendations.

**Specific Issue Teams:** Team 1: Simulator Grading / CT review  
Team 2: NUREG 1021  
Team 3: Waivers  
Team 4: OLMC-500  
Team 5: OL Program Oversight

## Summary of LLRT Recommendations with OLIT Plan

<b>LLRT Recommendation No.</b>	<b>1.1</b>
<b>Summary of LLRT Recommendation</b>	
The practice of “restoring a point when two non-critical errors are offset by correctly performing another activity in the same rating factor” shall be discontinued.	
<b>OLIT Plan</b>	
Implement as recommended.	
<b>Implementation Team</b>	
<b>Team 5: OL Program Oversight</b> - Revise/delete Interim Guidance.	
<b>Team 1: Simulator Grading/CT Review</b> - Revise guidance in NUREG 1021 and provide NUREG changes to Team 2.	
<b>NUREG 1021 Change</b>	
<b>Team 2: NUREG 1021</b> - Incorporate changes from Team 1.	
<b>Other</b>	

<b>LLRT Recommendation No.</b>	<b>1.2</b>
<b>Summary of LLRT Recommendation</b>	
<p>For simulator performance scoring, the range of scoring should be from 0 to 3 instead of 1 to 3. The passing threshold will remain 1.8.  IOLB review, revise, and clarify the definition of CT to include at minimum, the following:</p> <p>Criteria of post-scenario CT  Unintended RPS and ESFAS actuations be designated as CT  Training of examiners in the new CT definition and examples to improve consistency across regions  Incorporate these items into Examiner Standards  Ensure consistency among examinations related to the number of pre-planned CTs such that the variation in the number of CTs that each applicant is evaluated on shall be limited (ES-301-4). It is intended by the LLRT that the applicants encounter a nearly equal number of CTs.</p>	
<b>OLIT Plan</b>	
<p>Concur with the concept of revising grading to 0-3. Concur with suggested grading criteria for Communication and CTs (i.e., 3 point deduction for all areas except Communications which is a 2 point deduction with a minimum score of 1). Concur with LLRT recommendation to not create subcategories of CTs such as critical steps.</p>	
<b>Implementation Team</b>	
<p><b>Team 1: Simulator Grading/CT Review</b> - Review historical operating tests to evaluate effect of new grading scheme. <b>Implement a score of 1 in the communications section if a CT is missed instead of just a 1 point deduction.</b> Basis: If you miss a CT in any other category you get the lowest possible score, this should be the same for Communications which is a 1.</p> <p>Provide guidance for Critical Task grading and definition changes (i.e., Appendix D).</p> <p>Develop enhanced guidance for post-exam CTs (i.e., Post Exam CTs result from unauthorized, adverse operator actions or inaction which creates a new CT and must be a result of a performance deficiency). Include Recommendation 1.3 and 1.4. Review current guidance for distribution of CTs per ES-301 D.5.d.</p>	
<b>NUREG 1021 Change</b>	
<p><b>Team 2: NUREG 1021</b> - Incorporate changes from Team 1.</p>	
<b>Other</b>	
<p>Develop training materials for CTs that include specific examples for Examiner Conference. Could be significant industry interaction.</p>	

<b>LLRT Recommendation No.</b>	<b>1.3</b>
<b>Summary of LLRT Recommendation</b>	
<p>There should be guidance for the exam team and for the review panel regarding post-exam CTs.</p> <p>Wording to support the identification of post-exam CTs should be in ES-302 and ES-303. Documentation in the ES that it is acceptable for scenarios to contain more than the target number of CTs.</p> <p>OLMC-500 should be revised to prohibit a review panel from identifying and applying new CTs.</p>	
<b>OLIT Plan</b>	
<p>Concur with adding additional wording from ES-604.D.2.e to ES-302 and ES-303.</p> <p>Concur with documentation of acceptance of more than the target number of CTs.</p> <p><b>OLIT does not concur with the recommendation that an Appeal Panel cannot assign an error as a post-exam CT.</b> However, if the Appeal Panel can assign a post-exam CT then the OLIT recommends establishing a threshold to hold licenses in abeyance which border on failure and are related to the contested item, similar to the concept of holding licenses when there is a written exam failure. This review should be documented. Basis: As long as the error meets the definition of a “critical task” then you cannot ignore this just because it is identified by an Appeal Panel. However, it must be clearly identified and documented.</p>	
<b>Implementation Team</b>	
<p><b>Team 1: Simulator Grading/CT Review</b> - Incorporate post exam CT into appropriate NUREG sections and provide input to Team 2.</p>	
<p><b>Team 4: OLMC-500</b> - Determine if OLMC-500 should be revised to prohibit a review panel from identifying and applying new CTs.</p>	
<b>NUREG 1021 Change</b>	
<p><b>Team 2: NUREG 1021</b> - Requires changes to many areas of 1021 (ES-302, ES-303, and Appendix D, etc.). Incorporate changes from Team 1.</p>	
<b>Other</b>	

<b>LLRT Recommendation No.</b>	<b>1.4</b>
<b>Summary of LLRT Recommendation</b>	
Examiner Standards be modified to state that a CT is only a CT as determined by the multi-factor definition regardless if it is or is not initially identified as one on Forms ES-D1 or 2.	
<b>OLIT Plan</b>	
Concur with the recommendation.	
<b>Implementation Team</b>	
<p><b>Team 1: Simulator Grading/CT Review</b></p> <p>Determine if any clarifications need to be made regarding documentation of new CTs (even if not originally labeled as such) and provide guidance for evaluating other applicants' test prior to issuance of licenses.</p> <p>This is related to Item 1.3.</p>	
<b>NUREG 1021 Change</b>	
<p><b>Team 2: NUREG 1021</b> - Requires changes to many areas of 1021 (ES-301, ES-302, ES-303, and Appendix D, etc.). Incorporate changes from Team 1.</p>	
<b>Other</b>	
If definition changes, there could be industry interest.	

<b>LLRT Recommendation No.</b>	<b>1.5</b>
<b>Summary of LLRT Recommendation</b>	
Examiner Standards be modified to limit the association of a performance deficiency to no more than two rating factors.	
<b>OLIT Plan</b>	
<p>Based on considered examples, <b>the team does not concur with limiting performance deficiency to no more than two rating factors.</b></p> <p><b>The OLIT recommends no limit on the number of rating factors that could be assigned to an error as long as they are adequately justified.</b> Basis: The team verified that there were past examples where the error was documented in at least 3 rating factors, therefore, it should be allowed if it can be justified. Otherwise, the error should be limited only to the rating factor associated with the root cause.</p>	
<b>Implementation Team</b>	
<b>Team 1: Simulator Grading/CT Review - Do not limit performance deficiencies to 2 rating factors.</b>	
<b>NUREG 1021 Change</b>	
<b>Team 2: NUREG 1021 - Implement changes from Team 1.</b>	
<b>Other</b>	

<b>LLRT Recommendation No.</b>	<b>1.6</b>
<b>Summary of LLRT Recommendation</b>	
IOLB strongly establish and re-iterate their expectations regarding Examiner Standards implementation and the regions must implement the program consistently.	
<b>OLIT Plan</b>	
Concur with the recommendation.	
<b>Implementation Team</b>	
<p><b>Team 5: OL Program Oversight</b></p> <p>Review program consistency amongst regions. Ensure the 2013 Operator Licensing Consistency Working Group Report (ML13282A639) is reviewed.</p> <p>Determine how to hold Regions accountable for consistent implementation of the Licensing Program (reinforce positive actions and clearly define expectations).</p> <p>Identify and correct differences.</p>	
<b>NUREG 1021 Change</b>	
None anticipated.	
<b>Other</b>	

<b>LLRT Recommendation No.</b>	<b>1.7</b>
<b>Summary of LLRT Recommendation</b>	
<p>IOLB incorporate ROIs and FAQs permanently into the Examiner Standards within three years of issue.</p> <p>Also, consider creating a basis document for the Examiner Standards to capture the reason for key aspects of the guidance.</p>	
<b>OLIT Plan</b>	
<p>Concur with the recommendation.</p> <p>Suggest looking at Management Directive which may have guidance on how often we should incorporate changes. Regulatory Guides are currently on a 5 year timeframe for periodic review per MD 6.6.</p>	
<b>Implementation Team</b>	
<p><b>Team 5: OL Program Oversight</b></p> <p>Establish a way to incorporate LLRT recommendations.</p> <p>Annotate ROIs and FAQs that have been incorporated into the Examiner Standards.</p> <p>Ensure 1021 changes capture the basis for the changes. This practice will be applied to future changes (NUREG 1021, Rev. 11 will be the first time this is done).</p>	
<b>NUREG 1021 Change</b>	
<p><b>Team 2: NUREG 1021 - Change guidance as necessary</b></p>	
<b>Other</b>	

<b>LLRT Recommendation No.</b>	<b>1.8</b>
<b>Summary of LLRT Recommendation</b>	
<p>Strengthened and update initial and refresher examiner training to include recent case studies.</p> <p>Retraining or coaching should be based on results of IOLB audits, the appeal process, counterpart meeting discussions or input from industry.</p> <p>Class mentors for G-107 to focus on examples of note taking, writing technical comments, and use simulator event recorders and generated data.</p>	
<b>OLIT Plan</b>	
Concur with the recommendation.	
<b>Implementation Team</b>	
<p><b>Team 5: OL Program Oversight</b></p> <p>Establish a way to incorporate LLRT recommendations.</p> <p>Also see Item 4.3.</p>	
<b>NUREG 1021 Change</b>	
None anticipated.	
<b>Other</b>	
<p>Coordinate with TTC, as necessary.</p> <p>Seek industry input, as necessary.</p>	

<b>LLRT Recommendation No.</b>	<b>1.9</b>
<b>Summary of LLRT Recommendation</b>	
An audit peer review program should be developed that performs a regional review utilizing cross-regional examiners with the intent to target specific focused items to evaluate areas that will identify differences and best practices among the regions.	
<b>OLIT Plan</b>	
Concur with the recommendation.	
<b>Implementation Team</b>	
<b>Team 5: OL Program Oversight</b>	
Establish a way to incorporate LLRT recommendations.	
<b>NUREG 1021 Change</b>	
None anticipated.	
<b>Other</b>	

<b>LLRT Recommendation No.</b>	<b>2.1</b>
<b>Summary of LLRT Recommendation</b>	
<p>Waiver requests and decisions will be dispositioned in formal correspondence. Should emphasize that licensees submit waivers early in process. Suggest adding wording to corporate notification letter.</p>	
<b>OLIT Plan</b>	
<p>Concur with recommendation.</p>	
<b>Implementation Team</b>	
<p><b>Team 3: Waiver</b></p> <p>Determine appropriate method to emphasize early (define early) communication for waivers and provide input for changes to NUREG 1021.</p> <p>Incorporate Interim Guidance into the NUREG.</p>	
<b>NUREG 1021 Change</b>	
<p><b>Team 2: NUREG 1021</b> - Implement changes from Team 3.</p>	
<b>Other</b>	

<b>LLRT Recommendation No.</b>	<b>2.2</b>
<b>Summary of LLRT Recommendation</b>	
<p>Establish a “marginal performance band” such as scoring between 80-84 on the written exam, scoring between 1.8 and 2.0 on any competency on the simulator exam, and achieving &gt;80% on the JPM portion. If an applicant fails a portion of the exam but scores above the marginal performance band in other portions then the Region may grant a waiver of the passed sections.</p>	
<b>OLIT Plan</b>	
<p><b>Concur with the concept that a “marginal performance band” be established for the operating test however this should NOT apply to the written exam.</b> Basis: The grading of the written exam is not subjective and there is no evaluation performed by the NRC to determine what area an applicant may be deficient in. [REDACTED]  [REDACTED] The team must provide a basis for the performance band that is agreed upon.</p>	
<b>Implementation Team</b>	
<p><b>Team 3: Waiver</b></p> <p>Have OGC provide justification that there needs to be a performance band for the written examination.</p> <p><b>If required, establish a “marginal performance band” for the written exam as 80-82 and include guidance for the SRO-only portion of the exam.</b> This is also related to Item 2.3 regarding the specific band identified.</p> <p>Develop appropriate guidance to implement the “marginal performance band” concept into NUREG 1021 and provide to Team 2.</p>	
<b>NUREG 1021 Change</b>	
<p><b>Team 2: NUREG 1021</b> - Implement changes from Team 3.</p>	
<b>Other</b>	
<p>Significant industry input is expected.</p>	

<b>LLRT Recommendation No.</b>	<b>2.3</b>
<b>Summary of LLRT Recommendation</b>	
Revise NUREG 1021 to be consistent with the words in 10 CFR 55.35 on the use of the word "excused." This is based on sufficient justification which is what the new marginal performance band is based on.	
<b>OLIT Plan</b>	
Concur with recommendation.	
<b>Implementation Team</b>	
<p><b>Team 2: NUREG 1021</b></p> <p>Develop appropriate guidance to implement the recommendation.</p> <p>Consider OGC review comments provided for Revision 10 to NUREG 1021.</p>	
<b>NUREG 1021 Change</b>	
Team 2 to develop guidance independent of other teams.	
<b>Other</b>	

<b>LLRT Recommendation No.</b>	<b>2.4</b>
<b>Summary of LLRT Recommendation</b>	
Revise NUREG 1021 to clarify requirements of 10 CFR 55.35 and 10 CFR 55.47 with respect to waivers or excusal of examination requirements.	
<b>OLIT Plan</b>	
Concur with recommendation.	
<b>Implementation Team</b>	
<p><b>Team 2: NUREG 1021</b></p> <p>Develop appropriate guidance to implement the recommendation.</p> <p>Consider OGC review comments provided for Revision 10 to NUREG 1021.</p>	
<b>NUREG 1021 Change</b>	
Team 2 to develop guidance independent of other teams.	
<b>Other</b>	

<b>LLRT Recommendation No.</b>	<b>3.1</b>
<b>Summary of LLRT Recommendation</b>	
<p>The appeal panel for simulator scenarios shall be comprised of a minimum of 3 individuals to include a regional branch chief and an individual from IOLB.</p> <p>Revise OLMC-500 to not allow anyone from the affected region or who was associated with the exam administration to be on the panel.</p>	
<b>OLIT Plan</b>	
Concur with recommendation.	
<b>Implementation Team</b>	
<p><b>Team 4: OLMC-500</b></p> <p>Consider the impact if multiple regions are involved in administering the exam.</p> <p>Ensure that terminology is consistent throughout documents (i.e., appeal panel, admin review team, review panel, etc.)</p> <p>Provide any NUREG changes to Team 2.</p>	
<b>NUREG 1021 Change</b>	
Team 2: NUREG 1021 - Implement changes from Team 4.	
<b>Other</b>	

<b>LLRT Recommendation No.</b>	<b>3.2</b>
<b>Summary of LLRT Recommendation</b>	
Applicant makes a claim of bias/prejudice related to exam administration. Regional Administrator may offer an immediate re-examination if necessary. Re-examination team will consist of examiners from another region. Granting of a license should not be based solely on the claim of bias/prejudice.	
<b>OLIT Plan</b>	
Concur with recommendation.	
<b>Implementation Team</b>	
<b>Team 5: OL Program Oversight</b> - Implement as recommended. Provide any NUREG 1021 changes to Team 2.	
<b>Team 4: OLMC-500</b> - Review OLMC-500 for possible changes for claim of bias/prejudice related to exam administration.	
<b>NUREG 1021 Change</b>	
<b>Team 2: NUREG 1021</b> - Implement changes from Team 5. Possible change to ES-502.	
<b>Other</b>	
Requires change to OLMC-500.	

<b>LLRT Recommendation No.</b>	<b>3.3</b>
<b>Summary of LLRT Recommendation</b>	
<p>For any appeal, the affected region shall submit their review of the contested items via a formal memo from the Director of DRS to IOLB for consideration by the review team. If the appeal proposes a reversal of the original licensing decision then the affected region shall be afforded the opportunity to submit an additional written response articulating any further opposing view. This additional response shall be from the Regional Administrator to the Director NRR.</p>	
<b>OLIT Plan</b>	
Concur with recommendation to formally document contested items.	
<b>Implementation Team</b>	
<p><b>Team 4: OLMC-500</b></p> <p>Implement as recommended.</p> <p>If change involves NUREG 1021, then forward changes to Team 2.</p>	
<b>NUREG 1021 Change</b>	
Team 2: NUREG 1021 - Implement changes from Team 4. Possible change ES-502.	
<b>Other</b>	

<b>LLRT Recommendation No.</b>	<b>3.4</b>
<b>Summary of LLRT Recommendation</b>	
<p>Only contested areas should be reviewed for re-grading. Revise OLMC-500 to focus on the contested items and not performing a re-grade of the entire exam (or areas that were not contested). The focus of the appeal panel should be aimed at dispositioning the technical merits of the contested items only.</p>	
<b>OLIT Plan</b>	
<p>Concur with recommendations.</p>	
<b>Implementation Team</b>	
<p><b>Team 4: OLMC-500</b></p> <p>Implement as recommended, however, other sections of the exam may be reviewed to support re-grading the contested item for the individual (i.e., other areas of the exam shall not be re-graded but the weaknesses identified in other areas could be used to support the justification of the contested item).</p> <p>Ensure guidance addresses all types of appeals.</p> <p>If change involves NUREG 1021, then forward changes to Team 2.</p>	
<b>NUREG 1021 Change</b>	
<p><b>Team 2: NUREG 1021</b> - Implement changes from Team 4. Possible change ES-502.</p>	
<b>Other</b>	

<b>LLRT Recommendation No.</b>	<b>3.5</b>
<b>Summary of LLRT Recommendation</b>	
<p>Change both the Examiner Standards and OLMC-500 to include wording that if the results of an administrative review alter an applicant's score then other license denials should be reviewed for possible changes to the license decisions. It is inappropriate to revoke a license that already been issued.</p>	
<b>OLIT Plan</b>	
<p>Concur with recommendations, however, add guidance which addresses any licenses held in abeyance for possible negative impacts.</p>	
<b>Implementation Team</b>	
<p><b>Team 4: OLMC-500</b></p> <p>It appears that the LLRT report didn't address licenses that are held in abeyance. Team should develop guidance that addresses the impact of the review of contested items on held licenses, which could be a negative impact.</p> <p>Ensure guidance addresses all types of appeals.</p> <p>If change involves NUREG 1021, then forward changes to Team 2.</p>	
<b>NUREG 1021 Change</b>	
<p><b>Team 2: NUREG 1021</b> - Implement changes from Team 4. Possible change ES-502.</p>	
<b>Other</b>	

<b>LLRT Recommendation No.</b>	<b>3.6</b>
<b>Summary of LLRT Recommendation</b>	
<p>Both the Examiner Standards and OLMC-500 should contain guidance that documentation be handled in accordance with MD 3.4 and IMC-0620. The Examiner Standards should contain guidance that after the administrative review is completed and documented then pre-decisional drafts, e-mail correspondence and other background information should be deleted. OLMC-500 should contain guidance to create an "Administrative Review" ADAMS package to store documents required to satisfy MD 3.4. The team recommends rewriting OLMC-500 to consider partitioning the MC into separate sections for each part of the exam and medical appeals.</p>	
<b>OLIT Plan</b>	
<p>Concur with recommendations, however, the need to partition OLMC-500 will be left up to the Specific Issue Team when incorporating other recommendations.</p>	
<b>Implementation Team</b>	
<p><b>Team 4: OLMC-500</b></p> <p>Implement as recommended.</p> <p>Ensure the team addresses the additional procedure identified in the recommendations (IMC-0620).</p> <p>Determine need to partition OLMC-500 as recommended.</p> <p>Provide any changes to NUREG 1021 to Team 2.</p>	
<b>NUREG 1021 Change</b>	
<p><b>Team 2: NUREG 1021</b> - Implement changes from Team 4.</p>	
<b>Other</b>	

<b>LLRT Recommendation No.</b>	<b>3.7</b>
<b>Summary of LLRT Recommendation</b>	
Revise OLMC-500 to address the use of video recordings.	
<b>OLIT Plan</b>	
Concur with recommendation.	
<b>Implementation Team</b>	
<b>Team 4: OLMC-500</b> - Implement as recommended.	
<b>NUREG 1021 Change</b>	
NUREG 1021 changes have already been submitted for NUREG 1021, Rev.10.	
<b>Other</b>	

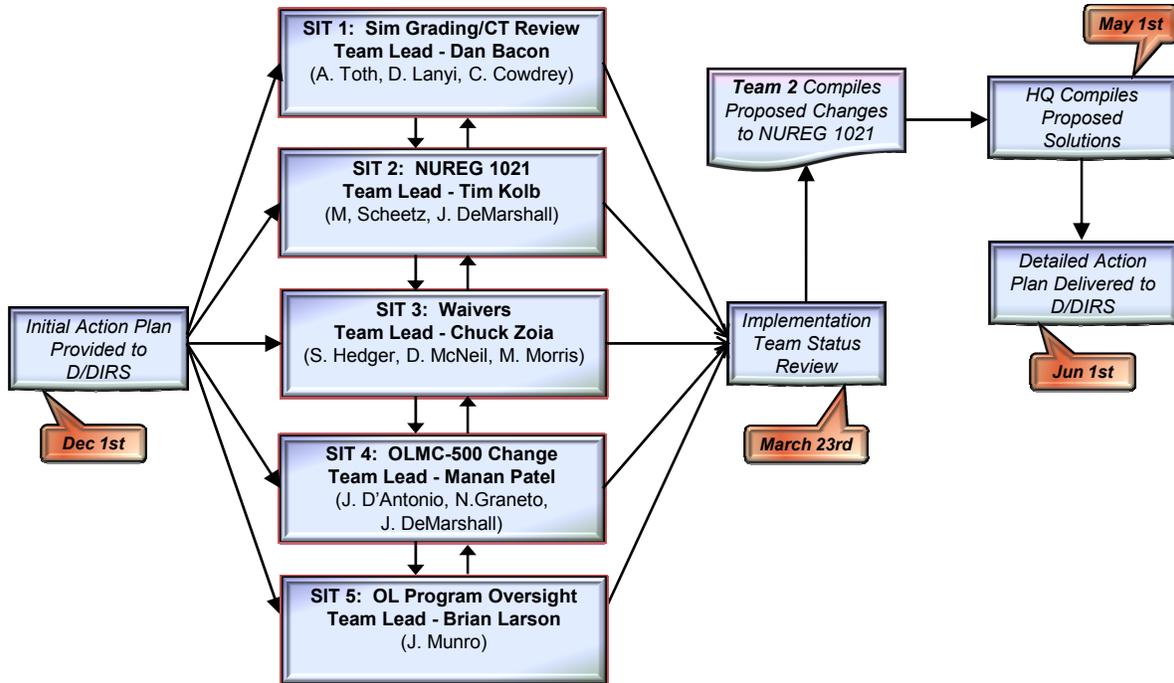
<b>LLRT Recommendation No.</b>	<b>4.1</b>
<b>Summary of LLRT Recommendation</b>	
A re-examination following an allegation of conflicts of interest or bias shall be observed by a branch chief or other management official IAW IMC-0102.	
<b>OLIT Plan</b>	
Concur with recommendation.	
<b>Implementation Team</b>	
<p><b>Team 5: OL Program Oversight</b></p> <p>Add this guidance to NUREG 1021 in the section that discusses re-take examinations. Provide these changes to Team 2.</p> <p>Consider adding clarification to IMC-0102.</p>	
<b>NUREG 1021 Change</b>	
Team 2: NUREG 1021 - Implement changes from Team 5.	
<b>Other</b>	

<b>LLRT Recommendation No.</b>	<b>4.2</b>
<b>Summary of LLRT Recommendation</b>	
<p>Regarding operating retake exams, select examiners to administer the exam who meet the following criteria: 1) did not administer any JPMs to the applicant, 2) did not administer/observe any scenario in which the applicant participated. (Any examiner who observed a retake applicant's original performance is prohibited from administering any part of the retake exam.) If an impartial team cannot be assembled in the affected region then examiners from another region shall be used.</p>	
<b>OLIT Plan</b>	
Concur with recommendation.	
<b>Implementation Team</b>	
<p><b>Team 4: OLMC-500</b></p> <p>Implement recommendation, however, consider adding additional criteria that the selected examiners should not have reviewed any previous applicant performance related to the examination failure.</p> <p>Provide any changes to NUREG 1021 to Team 2.</p>	
<b>NUREG 1021 Change</b>	
Team 2: NUREG 1021 - Implement changes from Team 4.	
<b>Other</b>	

<b>LLRT Recommendation No.</b>	<b>4.3</b>
<b>Summary of LLRT Recommendation</b>	
Incorporate case studies	
<b>OLIT Plan</b>	
Implement as recommended.	
<b>Implementation Team</b>	
This is encompassed by Item 1.8, assigned to Team 5.	
<b>NUREG 1021 Change</b>	
<b>Other</b>	
TTC involved.	

<b>LLRT Recommendation No.</b>	<b>5.0</b>
<b>Summary of LLRT Recommendation</b>	
The actions provided in the interim guidance should be institutionalized into the permanent guidance, with exceptions noted.	
<b>OLIT Plan</b>	
Agree that Interim Guidance should be sunsetted.	
<b>Implementation Team</b>	
<b>Team 5: OL Program Oversight</b> - Ensure current Interim Guidance has been superseded.	
<b>NUREG 1021 Change</b>	
NUREG changes are accounted for in previous recommendations.	
<b>Other</b>	

## Enclosure 2 – OLIT Specific Issue Team Action Plan Timeline



## Specific Issue Teams

There were five Specific Issue Teams (SITs) created so that each team could focus on a specific area, with Team 2, NUREG 1021, responsible for coordinating all other team inputs for the proposed NUREG 1021, Rev.11. The following is a list of the SITs:

- Team 1: Simulator Grading / CT review
- Team 2: NUREG 1021
- Team 3: Waivers
- Team 4: OLMC-500
- Team 5: OL Program Oversight

Each Specific Issue Team should implement the recommendations as suggested by the LLRT unless clarifying guidance is provided by the OLIT. Any implementation changes that require changes to NUREG 1021 shall be provided to Team 2 with associated changes fully identified using NUREG 1021, Rev. 10 as the basis document. Provide a basis for any NUREG changes to Team 2 to support development of a basis document for the changes. Since Team 2 is relying on input from the other SITs to complete specific tasks then all other teams should provide their identified NUREG 1021 changes to Team 2 as each task is completed. This will allow Team 2 the ability to incorporate changes to NUREG 1021 on an ongoing basis rather than at the end of the scheduled completion time. All teams should complete tasks that require a NUREG 1021 change as the highest priority.

## Team 1: Simulator Grading / CT Review

**Team Leader - Dan Bacon**

**Amanda Toth, Dave Lanyi, Chris Cowdrey**

**Scope:** Implement the listed recommendations as specified by the Operator Licensing Implementation Team (OLIT). The Specific Issue Team should implement the recommendation as suggested by the LLRT unless clarifying guidance is provided by the OLIT. Any implementation changes that require changes to NUREG 1021 shall be provided to Team 2 with associated changes fully identified using NUREG 1021, Rev. 10 as the basis document. Provide a basis for any NUREG changes to Team 2 as input to the basis document.

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>1.1</b>	The practice of “restoring a point when two non-critical errors are offset by correctly performing another activity in the same rating factor” shall be discontinued.	Implement as recommended.
<b>Specific Issue Team Actions</b>		<b>40</b>
Revise guidance in NUREG 1021.		10
Provide input (and basis) for changes to NUREG 1021 to Team 2.		30

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>1.2</b>	<p>For simulator performance scoring, the range of scoring should be from 0-3 instead of 1-3. The passing threshold will remain 1.8.</p> <p>IOLB review, revise, and clarify the definition of CT to include at minimum:</p> <p>Criteria of post-scenario CT            Unintended RPS and ESFAS actuations be designated as CT            Training of examiners in the new CT definition and examples to improve consistency across regions            Incorporate these items into Examiner Standards</p> <p>)Ensure consistency among examinations related to the number of pre-planned CTs such that the variation in the number of CTs that each applicant is evaluated on shall be limited. It is intended by the LLRT that the applicants encounter a nearly equal number of CTs.</p>	<p>Concur with the concept of revising grading to 0-3.</p> <p>Concur with suggested grading criteria for Communication and CTs (i.e., 3 point deduction for all areas except Communications. <b>We don't concur with the recommendation for communications being only a 1 point deduction with a minimum score of 1).</b></p> <p>Concur with LLRT recommendation to not create subcategories of CTs such as critical steps.</p>
<b>Specific Issue Team Actions</b>		<b>360</b>
Review historical operating tests to evaluate effect of implementing the new grading scheme. If the information results in a significant increase in failure rates then inform management promptly for re-consideration of criteria.		40
<p><b>Provide criteria that a score of 1 in the communications section is required if the applicant misses a CT instead of just 1 point deduction.</b>            Basis: If you miss a CT in any other category you get the lowest possible score, this should be the same for Communications (which is a 1).</p>		40
Provide guidance for Critical Task grading and definition changes (i.e., Appendix D).		80
Develop enhanced guidance for post-exam CTs (i.e., Post Exam CTs result from unauthorized, adverse operator actions or inaction which creates a new CT and must be a result of a performance deficiency). Include Recommendation 1.3 and 1.4.		80

Review current guidance for distribution of CTs per ES-301 D.5.d.	40
Add definition of “Post-Exam Critical Task” to NUREG 1021, Appendix F.	40
Provide input (and basis) for changes to NUREG 1021 to Team 2.	40

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>1.3</b>	<p>There should be guidance for the exam team and for the review panel regarding post-exam CTs.</p> <p>Wording to support the identification of post-exam CTs should be in ES-302 and ES-303</p> <p>Documentation in the ES that it is acceptable for scenarios to contain more than the target number of CTs</p> <p>OLMC-500 should be revised to prohibit a review panel from identifying and applying new CTs.</p>	<p>Concur with adding additional wording from ES-604.D.2.e to ES-302 and ES-303.</p> <p>Concur with documentation of acceptance of more than the target number of CTs.</p> <p><b>OLIT does not concur with the recommendation that an Appeal Panel cannot assign an error as a post-exam CT.</b></p>
<b>Specific Issue Team Actions</b>		<b>40</b>
Incorporate post-exam CTs into appropriate NUREG 1021 sections.		10
Document that it is acceptable for scenarios to contain more than the target number of CTs into appropriate sections of 1021.		10
Provide input (and basis) for changes to NUREG 1021 to Team 2.		20

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>1.4</b>	Examiners Standards be modified to state that a CT is only a CT as determined by the multi-factor definition regardless if it is or is not initially identified as one on Forms ES-D1 or 2.	Concur with the recommendation.

<b>Specific Issue Team Actions</b>	<b>40</b>
Determine if any clarifications need to be made regarding documentation of new CTs (even if not originally labeled as such).	15
Provide guidance for evaluating other applicants' test prior to issuance of licenses.	10
Note: This is related to item 1.3.	N/A
Provide input (and basis) for changes to NUREG 1021 to Team 2.	15

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>1.5</b>	Examiner Standards be modified to limit the association of a performance deficiency to no more than two rating factors.	<p>Based on considered examples, the team does not concur with limiting performance deficiency to no more than two rating factors.</p> <p><b>The OLIT recommends no limit on the number of rating factors that could be assigned to an error as long as they are adequately justified.</b></p>
<b>Specific Issue Team Actions</b>		<b>40</b>
Evaluate if performance deficiency should be limited to no more than two rating factors.		20
Provide input (and basis) for changes to NUREG 1021 to Team 2.		20

<b>TOTAL HOURS</b>	<b>520</b>
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## Team 2: NUREG 1021

Team Leader – Tim Kolb

Maurin Scheetz, Joe DeMarshall

**Scope:** Implement the listed recommendations as specified by the Operator Licensing Implementation Team. The Specific Issue Team should implement the recommendation as suggested by the LLRT unless clarifying guidance is provided by the OLIT. This team is relying on input from all of the other teams; therefore, the majority of the items in this list cannot start to be implemented until much later in the process. However, it is expected that as other teams develop their individual NUREG 1021 changes, these changes will be provided to Team 2 as early as possible.

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>1.1</b>	The practice of “restoring a point when two non-critical errors are offset by correctly performing another activity in the same rating factor” shall be discontinued.	Implement as recommended.
<b>Specific Issue Team Actions</b>		
Revise guidance in NUREG 1021.		
Incorporate changes provided by Team 1.		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
1.2	<p>For simulator performance scoring, the range of scoring should be from 0-3 instead of 1-3. The passing threshold will remain 1.8.</p> <p>IOLB review, revise, and clarify the definition of CT to include at minimum:</p> <ul style="list-style-type: none"> <li>)Criteria of post-scenario CT</li> <li>)Unintended RPS and ESFAS actuations be designated as CT</li> <li>)Training of examiners in the new CT definition and examples to improve consistency across regions</li> <li>)Incorporate these items into Examiner Standards</li> <li>)Ensure consistency among examinations related to the number of pre-planned CTs such that the variation in the number of CTs that each applicant is evaluated on shall be limited. It is intended by the LLRT that the applicants encounter a nearly equal number of CTs.</li> </ul>	<p>Concur with the concept of revising grading to 0-3.</p> <p>Concur with suggested grading criteria for Communication and CTs (i.e., 3 point deduction for all areas except communications which is a 1 point deduction with a minimum score of 1).</p> <p>Concur with LLRT recommendation to not create subcategories of CTs such as critical steps.</p>
<b>Specific Issue Team Actions</b>		
Note: Will require changes to many areas of NUREG 1021 (ES-301, Appendix D, etc.).		
Incorporate changes provided by Team 1		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<p style="text-align: center;"><b>1.3</b></p>	<p>There should be guidance for the exam team and for the review panel regarding post-exam CTs.</p> <p>Wording to support the identification of post-exam CTs should be in ES-302 and ES-303</p> <p>Documentation in the ES that it is acceptable for scenarios to contain more than the target number of CTs</p> <p>OLMC-500 should be revised to prohibit a review panel from identifying and applying new CTs.</p>	<p>Concur with adding additional wording from ES-604.D.2.e to ES-302 and ES-303.</p> <p>Concur with documentation of acceptance of more than the target number of CTs.</p> <p><b>OLIT does not concur with the recommendation that an Appeal Panel cannot assign an error as a post-exam CT.</b> However, if the Appeal Panel can assign a post-exam CT then the OLIT recommends establishing a threshold to hold licenses in abeyance which border on failure and are related to the contested item, similar to the concept of holding licenses when there is a written exam failure. This review should be documented.</p>
<p><b>Specific Issue Team Actions</b></p>		
<p>Note: Will require changes to many areas of NUREG 1021 (ES-302, ES-303, and Appendix D, etc.).</p>		
<p>Incorporate changes provided by Teams 1 and 4.</p>		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
1.4	Examiners Standards be modified to state that a CT is only a CT as determined by the multi-factor definition regardless if it is or is not initially identified as one on Forms ES-D1 or 2.	Concur with the recommendation
<b>Specific Issue Team Actions</b>		
Note: Will require changes to many areas of 1021 (ES-301, ES-302, ES-303, and Appendix D, etc.)		
Incorporate changes provided by Team 1.		
Note: If definition changes, there could be industry interest.		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
1.5	Examiner Standards be modified to limit the association of a performance deficiency to no more than two rating factors.	Based on considered examples, <b>the team does not concur with limiting performance deficiency to no more than two rating factors.</b>  The OLIT recommends no limit on the number of rating factors that could be assigned to an error as long as they are adequately justified.
<b>Specific Issue Team Actions</b>		
Incorporate changes provided by Team 1		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>1.7</b>	<p>IOLB incorporate ROIs and FAQs permanently into the Examiner Standards within three years of issue.</p> <p>Also, consider creating a basis document for the Examiner Standards to capture the reason for key aspects of the guidance.</p>	<p>Concur with the recommendation. Suggest looking at Management Directive which may have guidance on how often we should incorporate changes.</p>
<b>Specific Issue Team Actions</b>		
Incorporate changes provided by Team 5.		
Note: All Special Issue Teams are to provide a basis for their NUREG 1021 changes as a result of this recommendation		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>2.1</b>	<p>Waiver requests and decisions will be dispositioned in formal correspondence. Should emphasize that licensees submit waivers early in process. Suggest adding wording to corporate notification letter.</p>	<p>Concur with recommendation.</p>
<b>Specific Issue Team Actions</b>		
Incorporate changes provided by Team 3		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
2.2	Establish a “marginal performance band” such as scoring between 80-84 on the written exam, scoring between 1.8 and 2.0 on any competency on the simulator exam, and achieving only 80% on the JPM portion. If an applicant fails a portion of the exam but scores above the marginal performance band in other portions then the Region may grant a waiver of the passed sections.	<p><b>Concur with the concept that a “marginal performance band” be established for the operating test, however this should NOT apply to the written exam.</b></p> <p>. The Team must provide a basis for the performance band that is agreed upon.</p>
<b>Specific Issue Team Actions</b>		
Incorporate changes provided by Team 3		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
2.3	Revise NUREG 1021 to be consistent with the words in 10 CFR 55.35 on the use of the word “excused.” This is based on sufficient justification which is what the new marginal performance band is based on.	Concur with recommendation.
<b>Specific Issue Team Actions</b>		
Develop appropriate guidance to implement the recommendation.		
Consider OGC review comments provided for Revision 10 to NUREG 1021.		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
2.4	Revise NUREG 1021 to clarify requirements of 10 CFR 55.35 and 10 CFR 55.47 with respect to waivers or excusal of examination requirements.	Concur with recommendation.
<b>Specific Issue Team Actions</b>		
Develop appropriate guidance to implement the recommendation.		
Consider OGC review comments provided for Revision 10 to NUREG 1021.		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
3.1	<p>The appeal panel for simulator scenarios shall be comprised of a minimum of 3 individuals to include a regional branch chief and an individual from IOLB.</p> <p>Revise OLMC 0500 to not allow anyone from the affected region or who was associated with the exam administration to be on the panel.</p>	Concur with recommendation.
<b>Specific Issue Team Actions</b>		
Incorporate NUREG 1021 changes if provided by Team 4.		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
3.2	Applicant makes a claim of bias/prejudice related to exam administration. Regional Administrator may offer an immediate re-examination if necessary. Re-examination team will consist of examiners from another region. Granting of a license should not be based solely on the claim of bias/prejudice.	Concur with the recommendation.
<b>Specific Issue Team Actions</b>		
Incorporate NUREG 1021 changes if provided by Team 5.		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
3.3	For any appeal, the affected region shall submit their review of the contested items via a formal memo from the Director of DRS to IOLB for consideration by the review team. If the appeal proposes a reversal of the original licensing decision then the affected region shall be afforded the opportunity to submit an additional written response articulating any further opposing view. This additional response shall be from the Regional Administrator to the Director NRR.	Concur with recommendation to formally document contested items.
<b>Specific Issue Team Actions</b>		
Incorporate NUREG 1021 changes if provided by Team 4		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
3.4	Only contested areas should be reviewed for re-grading. Revise OLMC-0500 to focus on the contested items and not performing a re-grade of the entire exam (or areas that were not contested). The focus of the appeal panel should be aimed at dispositioning the technical merits of the contested items only.	Concur with recommendations.
<b>Specific Issue Team Actions</b>		
Incorporate NUREG 1021 changes if provided by Team 4.		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
3.5	Change both the examiner standards and OLMC-0500 to include wording that if the results of an administrative review alter an applicant's score then other license denials should be reviewed for possible changes to the license decisions. It is inappropriate to revoke a license that already been issued.	Concur with recommendations; however, add guidance which addresses any licenses held in abeyance for possible negative impacts.
<b>Specific Issue Team Actions</b>		
Incorporate NUREG 1021 changes if provided by Team 4.		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
3.6	Both the Examiner Standard and OLMC-0500 should contain guidance that documentation be handled in accordance with MD 3.4 and IMC 0620. The Examiner Standards should contain guidance that after the administrative review is completed and documented then pre-decisional drafts, e-mail correspondence and other background information should be deleted. OLMC-0500 should contain guidance to create an "Administrative Review" ADAMS package to store documents required to satisfy MD 3.4. The team recommends rewriting OLMC-0500 to consider partitioning the MC into separate sections for each part of the exam and medical appeals.	Concur with recommendations; however, the need to partition OLMC-0500 will be left up to the Specific Issue Team when incorporating other recommendations.
<b>Specific Issue Team Actions</b>		
Incorporate NUREG 1021 changes if provided by Team 4.		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
3.7	Revise OLMC 0500 to address the use of video recordings.	Concur with recommendation.
<b>Specific Issue Team Actions</b>		
Incorporate any additional NUREG 1021 changes if provided by Team 4.		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
4.1	A re-examination following an allegation of conflicts of interest or bias shall be observed by a branch chief or other management official IAW IMC-0102.	Concur with recommendation.
<b>Specific Issue Team Actions</b>		
Incorporate NUREG 1021 changes if provided by Team 5.		

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
4.2	Regarding operating retake exams, select examiners to administer the exam who meet the following criteria: 1) did not administer any JPMs to the applicant, 2) did not administer/observe any scenario in which the applicant participated. (Any examiner who observed a retake applicant's original performance is prohibited from administering any part of the retake exam.) If an impartial team cannot be assembled in the affected region then examiners from another region shall be used.	Concur with recommendation.
<b>Specific Issue Team Actions</b>		
Implement recommendation and revise NUREG 1021 (i.e., ES-303s, waiver criteria, etc.).		
Incorporate NUREG 1021 changes if provided by Team 4.		

<b>TOTAL HOURS</b>	<b>N/A</b>
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## Team 3: Waivers

**Team Leader – Chuck Zoia**

**Sean Hedger, Dell McNeil**

**Scope:** Implement the listed recommendations as specified by the Operator Licensing Implementation Team. The Special Issue Team should implement the recommendation as suggested by the LLRT unless clarifying guidance is provided by the OLIT. Any implementation changes that require changes to NUREG 1021 shall be provided to Team 2 with associated changes fully identified using NUREG 1021, Rev. 10 as the basis document.

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>2.1</b>	Waiver requests and decisions will be dispositioned in formal correspondence. Should emphasize that licensees submit waivers early in process. Suggest adding wording to corporate notification letter.	Concur with recommendation.
<b>Specific Issue Team Actions</b>		<b>65</b>
Determine appropriate method to emphasize early (define early) communication for waivers.		5
Incorporate Interim Guidance into NUREG 1021 and provide input (and basis) to Team 2.		10
Review NUREG 1021 and clarify the terms “Waiver” and “Excusal”		40
Provide input (and basis) for changes to NUREG 1021 to Team 2.		10

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>2.2</b>	<p>Establish a “marginal performance band” such as scoring between 80-84 on the written exam, scoring between 1.8 and 2.0 on any competency on the simulator exam, and achieving only 80% on the JPM portion. If an applicant fails a portion of the exam but scores above the marginal performance band in other portions then the Region may grant a waiver of the passed sections.</p>	<p>Concur with the concept that a “marginal performance band” be established for the operating test; <b>however this should NOT apply to the written exam.</b></p> <p>. The Team must provide a basis for the performance band that is agreed upon.</p>
<b>Specific Issue Team Actions</b>		<b>75</b>
Ensure the team reviews OGC comments for NUREG 1021, Rev. 10.		10
Have OGC provide justification that there needs to be a performance band for the written examination.		10
Coordinate the OGC (justification) review with HQ.		10
If required, establish a “marginal performance band” for the written exam as 80-82 and include guidance for the SRO-only portion of the exam (Note: This is also related to item 2.3 regarding the specific band identified).		25
Develop appropriate guidance to implement the “marginal performance band” concept into NUREG 1021.		15
Provide input (and basis) for changes to NUREG 1021 to Team 2.		5

<b>TOTAL HOURS</b>	<b>140</b>
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## **Team 4: OLMC-500 Change**

**Team Leader – Manan Patel**

**Joe D’Antonio, Nora Graneto, Joe DeMarshall**

**Scope:** Implement the listed recommendations as specified by the Operator Licensing Implementation Team. The Specific Issue Team should implement the recommendation as suggested by the LLRT unless clarifying guidance is provided by the OLIT. Any implementation changes that require changes to NUREG 1021 shall be provided to Team 2 with associated changes fully identified using NUREG 1021, Rev. 10 as the basis document. Provide basis for any NUREG changes to Team 2 as input to the basis document.

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>1.3</b>	<p>There should be guidance for the exam team and for the review panel regarding post-exam CTs.</p> <p>Wording to support the identification of post-exam CTs should be in ES-302 and ES-303 Documentation in the ES that it is acceptable for scenarios to contain more than the target number of CTs</p> <p>OLMC-500 should be revised to prohibit a review panel from identifying and applying new CTs.</p>	<p>Concur with adding additional wording from ES-604.D.2.e to ES-302 and ES-303.</p> <p>Concur with documentation of acceptance of more than the target number of CTs.</p> <p><b>OLIT does not concur with the recommendation that an Appeal Panel cannot assign an error as a post-exam CT.</b> However, if the appeal panel can assign a post-exam CT then the <b>OLIT recommends establishing a threshold to hold licenses in abeyance which border on failure and are related to the contested item, similar to the concept of holding licenses when there is a written exam failure.</b> Documentation of this review should be documented.</p>
<b>Specific Issue Team Actions</b>		<b>161</b>
Determine if OLMC-500 should be revised to prohibit a review panel from identifying and applying new CTs		1
Establish a threshold to hold license in abeyance		40
Revise OLM-0500 to hold license in abeyance		120

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>3.1</b>	<p>The appeal panel for simulator scenarios shall be comprised of a minimum of 3 individuals to include a regional branch chief and an individual from IOLB.</p> <p>Revise OLMC 0500 to not allow anyone from the affected region or who was associated with the exam administration to be on the panel.</p>	Concur with recommendation.
<b>Specific Issue Team Actions</b>		<b>32</b>
Consider the impact if multiple regions are involved in administering the exam		8
Ensure that terminology is consistent throughout documents (i.e., appeal panel, admin review team, review panel, etc.)		16
Provide input (and basis) for changes to NUREG 1021 to Team 2		8

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
3.2	Applicant makes a claim of bias/prejudice related to exam administration. Regional Administrator may offer an immediate re-examination if necessary. Re-examination team will consist of examiners from another region. Granting of a license should not be based solely on the claim of bias/prejudice.	Concur with the recommendation.
<b>Specific Issue Team Actions</b>		<b>32</b>
Evaluate need for change to OLMC 0500		8
Implement change to OLMC 0500 if required; Use Team 5 Input (Basis)		24

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
3.3	For any appeal, the affected region shall submit their review of the contested items via a formal memo from the Director of DRS to IOLB for consideration by the review team. If the appeal proposes a reversal of the original licensing decision then the affected region shall be afforded the opportunity to submit an additional written response articulating any further opposing view. This additional response shall be from the Regional Administrator to the Director NRR.	Concur with recommendation to formally document contested items.
<b>Specific Issue Team Actions</b>		<b>64</b>
Implement as recommended		32
Provide input (and basis) for changes to NUREG 1021 to Team 2		32

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
3.4	Only contested areas should be reviewed for re-grading. Revise OLMC-0500 to focus on the contested items and not performing a re-grade of the entire exam (or areas that were not contested). The focus of the appeal panel should be aimed at dispositioning the technical merits of the contested items only.	Concur with recommendations.
<b>Specific Issue Team Actions</b>		<b>32</b>
Implement as recommended, however, reviewing other sections of the exam may be reviewed to support re-grading the contested item for the individual (i.e., other areas of the exam shall not be re-graded but the weaknesses identified in other areas could be used to support the justification of the contested item).		16
Ensure guidance addresses all types of appeals		8
Provide input (and basis) for changes to NUREG 1021 to Team 2		8

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
3.5	Change both the Examiner Standards and OLMC-0500 to include wording that if the results of an administrative review alter an applicant's score then other license denials should be reviewed for possible changes to the license decisions. It is inappropriate to revoke a license that already been issued.	Concur with recommendations; however, add guidance which addresses any licenses held in abeyance for possible negative impacts.
<b>Specific Issue Team Actions</b>		<b>32</b>
The LLRT report appears this recommendation didn't address licenses that are held in abeyance. Team should develop guidance that addresses the impact of the review of contested items on held licenses, which could be a negative impact.		16
Ensure guidance addresses all types of appeals.		8
Provide input (and basis) for changes to NUREG 1021 to Team 2.		8

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>3.6</b>	Both the Examiner Standard and OLMC-0500 should contain guidance that documentation be handled in accordance with MD 3.4 and IMC 0620. The Examiner Standards should contain guidance that after the administrative review is completed and documented then pre-decisional drafts, e-mail correspondence and other background information should be deleted. OLMC-0500 should contain guidance to create an “Administrative Review” ADAMS package to store documents required to satisfy MD 3.4. The team recommends rewriting OLMC-0500 to consider partitioning the MC into separate sections for each part of the exam and medical appeals.	Concur with recommendations; however, the need to partition OLMC-0500 will be left up to the Specific Issue Team when incorporating other recommendations.
<b>Specific Issue Team Actions</b>		<b>32</b>
Ensure the team addresses the additional procedure identified in the recommendations (IMC-0620)		16
Determine need to partition OLMC-0500 as recommended		8
Provide input (and basis) for changes to NUREG 1021 to Team 2		8

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>3.7</b>	Revise OLMC 0500 to address the use of video recordings.	Concur with recommendation.
<b>Specific Issue Team Actions</b>		<b>32</b>
Implement as recommended; Provide input (and basis) for changes to NUREG 1021 to Team 2.		32

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>4.2</b>	Regarding operating retake exams, select examiners to administer the exam who meet the following criteria: 1) did not administer any JPMs to the applicant, 2) did not administer/observe any scenario in which the applicant participated. (Any examiner who observed a retake applicant's original performance is prohibited from administering any part of the retake exam.) If an impartial team cannot be assembled in the affected region then examiners from another region shall be used.	Concur with recommendation.
<b>Specific Issue Team Actions</b>		<b>64</b>
However, consider adding criteria that the selected examiners should not have reviewed any previous applicant performance related to the examination failure (i.e., ES-303s, waiver criteria, etc.)		32
Provide input (and basis) for changes to NUREG 1021 to Team 2		32

<b>TOTAL HOURS</b>	<b>481</b>
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## Team 5: OL Program Oversight

**Team Leader - Brian Larson**

**Team Members - TBD**

**Scope:** Implement the listed recommendations as specified by the Operator Licensing Implementation Team. The Special Issue Team should implement the recommendation as suggested by the LLRT unless clarifying guidance is provided by the OLIT. Any implementation changes that require changes to NUREG 1021 shall be provided to Team 2 with associated changes fully identified using NUREG 1021, Rev. 10 as the basis document.

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>1.1</b>	The practice of “restoring a point when two non-critical errors are offset by correctly performing another activity in the same rating factor” shall be discontinued.	Implement as recommended.
<b>Specific Issue Team Actions</b>		<b>20</b>
Revise Interim Guidance		20

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>1.6</b>	IOLB strongly establish and re-iterate their expectations regarding Examiner Standards implementation and the regions must implement the program consistently.	Concur with the recommendation
<b>Specific Issue Team Actions</b>		<b>140</b>
Review program consistency amongst regions. Ensure the 2013 Operator Licensing Consistency Working Group Report (ML13282A639) is reviewed.		40
Determine how to hold Regions accountable for consistent implementation of the licensing program (reinforce positive actions and clearly define expectations)		20
Identify and correct differences		80

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>1.7</b>	<p>IOLB incorporate ROIs and FAQs permanently into the Examiner Standards within three years of issue.</p> <p>Also, consider creating a basis document for the Examiner Standards to capture the reason for key aspects of the guidance.</p>	<p>Concur with the recommendation. Suggest looking at Management Directive which may have guidance on how often we should incorporate changes.</p>
<b>Specific Issue Team Actions</b>		<b>104</b>
Establish a way to incorporate LLRT recommendations.		8
Annotate ROIs and FAQs that have been incorporated into the Examiner Standards		24
Ensure future changes to NUREG 1021 capture the basis for the changes. (Rev. 11 will be the first time this is done).		16
Review Management Directive for guidance on how often we should incorporate changes		16
Provide input (and basis) for changes to NUREG 1021 to Team 2		40

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>1.8</b>	<p>Strengthened and update initial and refresher examiner training to include recent case studies.</p> <p>Retraining or coaching based on results of IOLB audits, the appeal process, counterpart meeting discussions or input from industry.</p> <p>Class mentors for G-107 to focus on examples of note taking, writing technical comments, and use simulator event recorders and generated data.</p>	Concur with the recommendation.
<b>Specific Issue Team Actions</b>		<b>72</b>
Establish a way to incorporate LLRT recommendations		40
Note: Also see Item 4.3		-
Coordinate with TTC, as necessary		8
Seek industry input, as necessary		24

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>1.9</b>	An audit peer review program should be developed that performs a regional review utilizing cross-regional examiners with the intent to target specific focused items to evaluate areas that will identify differences and best practices among the regions.	Concur with the recommendation.
<b>Specific Issue Team Actions</b>		<b>40</b>
Establish a way to incorporate LLRT recommendations		40

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>3.2</b>	Applicant makes a claim of bias/prejudice related to exam administration. Regional Administrator may offer an immediate re-examination if necessary. Re-examination team will consist of examiners from another region. Granting of a license should not be based solely on the claim of bias/prejudice.	Concur with the recommendation.
<b>Specific Issue Team Actions</b>		<b>30</b>
Possible change to NUREG 1021, ES-502		10
Provide input (and basis) for changes to NUREG 1021 to Team 2		15
Note: May require change to OLMC 0500 (Team 4)		5

LLRT Rec No.	Summary of LLRT Recommendation	OLIT Plan
<b>4.1</b>	A re-examination following an allegation of conflicts of interest or bias shall be observed by a branch chief or other management official IAW IMC-0102.	Concur with recommendation.
<b>Specific Issue Team Actions</b>		<b>56</b>
Add this guidance to NUREG 1021 in the section that discusses re-take examinations		24
Consider adding clarification to IMC-0102		8
Provide input (and basis) for changes to NUREG 1021 to Team 2		24

<b>TOTAL HOURS</b>	<b>462</b>
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