

June 9, 2015

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 (OLIT) FINAL
ACTION PLAN

The purpose of this memorandum is to transmit the Operator Licensing Implementation Team (OLIT) Final Action Plan for implementing the recommendations provided by the Lessons Learned Review Team (LLRT) (Agencywide Documents Access and Management System (ADAMS) publicly available document No. ML15124A306). The LLRT was convened after the March 18, 2014, Atomic Safety and Licensing Board decision to overturn the NRC staff's denial of a Senior Operator License for an applicant at the Vogtle Electric Generating Plant.

The OLIT was chartered with analyzing, grouping and prioritizing the LLRT recommendations, and then planning a course of action for implementation of appropriate changes to operator licensing processes and procedures. The OLIT has fulfilled the objectives of its charter by identifying appropriate, integrated solutions to the LLRT recommendations. Five Specific Issue Teams (SITs) were created and tasked with development of detailed implementation action plans.

Overall, 19 of the 23 recommendations are being implemented as originally intended by the LLRT. The OLIT determined that four LLRT recommendations would be implemented in a different manner as detailed in its initial OLIT Action Plan (ADAMS publicly available document No. ML15126A138). During development of this final action plan, it was determined that one of the modified recommendations (for establishing Operating Test marginal performance bands) should not be implemented as planned. Instead, it was decided that guidance should be added to NUREG-1021, *Rev. 11, "Operator Licensing Examination Standards for Power Reactors."* to state that justification for any test or examination excusal will be based on following the licensee's Systems Approach to Training (SAT) process for applicant remediation, retesting and requalification training participation. This decision was based, in part, on NRC's analysis regarding marginal performance bands, wherein a justification for excusal would still be required for NRC evaluation even if an applicant's performance was within an established marginal band.

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Enclosure 1 provides the details of the OLIT Teams and an overview of the final action plan.

Enclosure 2 provides information relevant to each LLRT recommendation. It describes each recommendation, the basis for revising the recommendation (if applicable), the Specific Issue Team (SIT) responsible for the resolution, the resolution recommended by the SIT and the Branch Chief concurrence with the final resolution.

Enclosure 3 is a schedule for issuing NUREG 1021, which will incorporate the final changes as recommended by the OLIT, after considering input from internal and external stakeholders. The recommended changes relating to OLMC 0310, "Regional Office Visit Procedure," and OLMC 0500, "Processing Requests for Administrative Reviews and Hearings," will be implemented before NUREG 1021, Rev.11, as appropriate. The interim guidance, published on May 15, 2014 (ADAMS Accession Number ML14107A395), must remain in place until NUREG 1021, Rev.11 is issued and available for use, at which time the interim guidance will no longer be applicable.

Enclosures:

1. OLIT
2. LLRT Recommendations
3. Action Plan Timeline

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***concurred via email**

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Operator Licensing Implementation Team (OLIT) Final Action Plan

Objective: Provide a final resolution for each of the Lessons Learned Review Team (LLRT) recommendations that has been agreed upon at the office level among all the regions and the headquarters program office.

OLIT Team Members: Tim Kolb – Nuclear Reactor Regulation(NRR), Joe DeMarshall – Office of New Reactors(NRO), Manan Patel – R I, Dan Bacon – R II, Chuck Zoia – R III, Brian Larson – R IV.

Specific Issue Teams and Leads:

- Team 1: Simulator Grading/CT review (Dan Bacon – Region II)
- Team 2: NUREG 1021 (Tim Kolb – NRR)
- Team 3: Waivers (Chuck Zoia – Region III)
- Team 4: OLMC 0500 (Manan Patel – Region I)
- Team 5: HQ Program Oversight (Brian Larson – Region IV)

Additional Team Members:

Randal Baker, Michael Bielby, Bruno Caballero, Christian Cowdrey, Sean Currie, Sean Hedger, David Lanyi, Michael Meeks, Michael Morris, David Muller, John Munro, David Reeser, Maurin Scheetz, David Silk, Amanda Toth, Joseph Viera, Keith Walton

Overview:

The OLIT initially assessed the recommendations from the LLRT and determined that all 23 recommendations could be implemented, however four of the recommendations required modification. The modifications were identified as alternative methods to improve the examination process and were required to have unanimous approval from all OLIT members. Otherwise, the OLIT agreed that the original recommendation would be implemented as recommended. The OLIT assigned each LLRT recommendation to a Specific Issue Team (SIT) for resolution. The SIT was tasked with generating an action plan that included identifying all steps necessary to implement each recommendation. Steps included conducting analysis, soliciting input, revising documents, etc. The SITs met the week of March 23, 2015, to present their action plans to all OLIT members whose input was used to finalize the path forward and to attain alignment from all regions and the program office. The combined action plans from all SITs support the implementation of 22 of the 23 recommendations from the LLRT. It was determined that a marginal performance band would **not** be implemented. However, guidance would be added to NUREG 1021 such that any excusal justification would be based on the licensee's System Approach to Training (SAT) process being followed for remediation, retesting and requalification training participation. This decision was based, in part, on NRC analysis of

marginal performance bands, where in a justification for excusal would still be required for NRC evaluation even if an applicant's performance were within an established marginal band.

Major proposed document changes include NUREG 1021, OLMC 0310 and OLMC 0500. In addition, a Microsoft Access database solution was developed as a mechanism to identify, track, and resolve regional consistency issues.

LLRT Recommendation Section 1 NUREG-1021 Grading Standards for Simulator Operating Tests and Regional Consistency					
LLRT Recommendations		OLIT Plan	Implementation Team	Scope of Change	BC Concurrence
1.1	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.	<p>Team 5: HQ Program Oversight</p> <p>Revise Interim Guidance. (ML14107A395)</p> <p>Team 1: Simulator Grading/CT review</p> <p>Revise guidance in NUREG 1021 and provide NUREG 1021 changes to Team 2.</p>	<p>No issues with implementing this item.</p> <p>Interim guidance to remain in effect until NUREG 1021, Rev. 11 is issued.</p>	Acceptable
1.2	<p>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.</p> <p>Operator Licensing and Training Branch (IOLB) review, revise, and clarify the definition of critical task (CT) to include at minimum:</p> <ol style="list-style-type: none"> Criteria of post-scenario CT Unintended Reactor Protection System (RPS) and Emergency Safeguards Actuation System (ESFAS) actuation 	<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 2 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>	<p>Team 1: Simulator Grading/CT review</p> <p>Take a look at historical operating tests to evaluate effect of new grading scheme.</p> <p>Implement a score of 1 in the communications section if miss a CT instead of just 1 point deduction. 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,</p>	<p>Implement 0 to 3 grading scale. CT failure is a grade of 0 for that competency except in the Communications section which would be a 1. Grading of >1.8 is still the pass guidance.</p> <p>The TS grading will be revised to account for 3 rating factors.</p> <ul style="list-style-type: none"> Implications of historical regrades resulted in changing rating factor weights in RO competency area (CA) 2 (Procedures) and breaking SRO CA 6 (TS) into 3 rating factors. <p>Enhanced CT guidance to</p>	<p>Acceptable</p> <p>Good examples of borderline grading.</p> <p>Consider instituting a “range” of TS calls for scenarios to address equitable distribution across all applicants.</p> <p>Resolution: The TS competency will be expanded to 3 areas with one associated with event based (Locate) and one associated with each individual TS (Identify)</p>

	<p>be designated as CT</p> <p>3) Training of examiners in the new CT definition and examples to improve consistency across regions</p> <p>4) Incorporate these items into Examiner Standards</p> <p>5) 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.</p>		<p>adverse operator actions or inaction which creates a new CT and must be a result of a performance deficiency).</p> <p>Include Recommendation 1.3 and 1.4. Review current guidance for distribution of CTs per ES-301 D.5.d.</p>	<p>include pre-identifying CTs.</p>	
<p>1.3</p>	<p>There should be guidance for the exam team and for the review panel regarding post-exam CTs.</p> <ul style="list-style-type: none"> - 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 	<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>OLIT does not concur with the recommendation that an Appeal Panel cannot assign an error as a post-exam CT.</p>	<p>Team 1: Simulator Grading/CT review</p> <p>Incorporate post exam CT into appropriate NUREG sections and forward to Team 2.</p> <p>Team 4: OLMC 0500</p> <p>Determine if OLMC-500 should be revised to prohibit a review panel from identifying and applying new CTs.</p>	<p>Team 1:</p> <p>Revised the exam development to add total number of CTs to include potential CTs based on operator action. These should be identified during exam development.</p> <p>CTs in form ES-301-4 broken into EOP CTs and total number of CTs to allow identifying CTs before the major prior to exam administration. "Target" rather "limit" is reiterated. Included guidance to select</p>	<p>Acceptable</p> <p>Consider clarifying Appendix D of NUREG 1021 for the treatment of critical tasks between Initial License Training and Requalification Training.</p> <p>ES-501 should be revised to add option to submit post exam comments for the operating test.</p>

	<p>of CTs. OLMC-500 should be revised to prohibit a review panel from identifying and applying new CTs.</p>	<p>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>scenario sets with total CTs per team in mind.</p> <p>Guidance on identifying CTs post-scenario enhanced. Included clarification that the exam team should also screen errors corrected by other applicants for whether there are CT implications.</p> <p>Allowed use of a “blanket statement” to cover validating unexpected applicant actions that result in RPS/ESFAS action against Appx D for CTs.</p> <p>Team 4: OLMC revised to allow the review panel to identify CTs however it must be related to a contested item.</p> <p>Abeyance criteria for the operating test has been added to ES-501, D.3.c. This includes revision of exam proposed denial cover letters(Att. 5) For JPMs, 80% is the cutoff for abeyance. Op test “same scenario-same event” error that would result in a failure if subsequently assessed as a critical task during an administrative review.</p>	
<p>1.4</p>	<p>Examiners Standards be modified to state</p>	<p>Concur with the recommendation</p>	<p>Team 1: Simulator Grading/CT review</p>	<p>Provided enhancement to NUREG to refer to definition</p>	<p>Acceptable</p>

	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.		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. This is related to item 1.3.	of CT when talking about CTs.	
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, the team does not concur with limiting performance deficiency to no more than two rating factors.	Team 1: Simulator Grading/CT review Do not limit performance deficiencies to 2 rating factors.	Added guidance to not limit performance deficiencies to 2 rating factors.	Acceptable Consider piloting.
1.6	IOLB strongly establish and re-iterate their expectations regarding Examiner Standards implementation and the regions must implement the program consistently.	Concur with the recommendation	Team 5: HQ Program Oversight Review program consistency amongst regions. Determine how to hold Regions accountable for consistent implementation of the licensing program (reinforce positive actions and clearly define expectations). Identify and correct differences.	Create list of Regional Differences and maintain as living document. Revise OLMC 310 to: <ul style="list-style-type: none"> • Review regional implementation of 1021 • Reinforce best practices and support continuous improvement • Re-iterate policy expectations and report region success 	Acceptable Do a sample of regional differences in the OLMC 310 review.
1.7	IOLB incorporate ROIs and FAQs permanently into the Examiner Standards within three years of issue. Also, consider creating a basis document for the Examiner Standards to capture the reason for key aspects of the	Concur with the recommendation. Suggest looking at Management Directive which may have guidance on how often we should incorporate changes.	Team 5: HQ Program Oversight Establish a way to incorporate LLRT recommendations. Annotate ROIs and FAQs that have been incorporated into the Examiner Standards. Ensure NUREG 1021 changes capture the basis for the changes. This practice will be applied to future changes (NUREG 1021,	Formalize methods to review and incorporate ROI/FAQ into 1021 revisions. Formalize processing 1021 revisions, creating basis documentation for Rev 11 and up.	Acceptable Goal should be to get rid of old FAQ's from website and indicate which ROIs have been incorporated in each succeeding NUREG 1021 revision, starting with Rev.11.

	guidance.		Rev. 11 will be the first time this is done).		
1.8	<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	<p>Team 5: HQ Program Oversight</p> <p>Establish a way to incorporate LLRT recommendations.</p> <p>Also see Item 4.3.</p>	<p>IMC-1245 C-10 has been revised to include review of ASLB decision and discuss with Branch Chief.</p> <p>Coordinate with TTC to update initial (G-107) and refresher examiner training content.</p> <ul style="list-style-type: none"> • Case studies • IOLB audits • Industry input <p>Ensure links exist between:</p> <ul style="list-style-type: none"> • initial quals (IMC-1245) • initial training • refresher training <p>Provide examiner training on NUREG 1021 revisions</p>	<p>Acceptable</p> <p>Ensure ROIs are sent to TTC for inclusion into training material.</p>
1.9	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	<p>Team 5: HQ Program Oversight</p> <p>Establish a way to incorporate LLRT recommendations.</p>	<p>Develop program that includes:</p> <ul style="list-style-type: none"> • cross regional examiners • dynamic target focus items • minimum regional differences & a means to communicate best practices 	<p>Acceptable</p> <p>Intent is to get at least one examiner per region per year to go outside the region.</p> <p>HQ to track this effort.</p>

LLRT Recommendation Section 2 The Waiver process for Previously Passed Portions of the Examination					
LLRT Recommendations		OLIT Plan	Implementation Team	Scope of Change	BC Concurrence
2.1	Waiver requests and decisions will be dispositioned in formal correspondence. Emphasize that licensees submit waivers early in process. Add wording to corporate notification letter.	Concur with recommendation.	Team 3: Waiver Determine appropriate method to emphasize early (define early) communication for waivers and provide input for changes to NUREG 1021. Incorporate Interim Guidance into the NUREG.	Determined that “early” communication would be 60 days. Added guidance to ES-201, 202, 204, 303,402,501 and Appendix F. Ensure Form 398 addresses Excusals correctly.	Acceptable Ensure “Denial Letter” is updated. May want to put criteria directly in this letter.
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.	Concur with the concept that a “marginal performance band” be established for the operating test however this should NOT apply to the written exam. The Team must provide a basis for the performance band that is agreed upon.	Team 3: Waiver Provide justification that there needs to be a performance band for the written examination. 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 also. This is also related to item 2.3 regarding the specific band identified. Develop appropriate guidance to implement the “marginal performance band” concept into NUREG 1021 and provide to Team 2.	No marginal performance band was defined for either the written or operating exam. Any excusal justification will be based on the licensee’s SAT process being followed for remediation, retesting and requal training participation. 10 CFR 55.35(b) allows the licensee to request and justify excusals with <u>any</u> passing score, independent of how a performance band is defined. This applies to both higher and lower passing scores.	Acceptable Develop a standard statement for licensees to put in Block 17 of Form 398. Need to add in items that the NRC wants to see when evaluating justification for excusals.
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	Concur with recommendation.	Team 2: NUREG 1021 Develop appropriate guidance to implement the recommendation.	This is covered by items 2.1 and 2.2 which Team 3 provided. The new performance band is not being implemented.	Acceptable

	based on sufficient justification which is what the new marginal performance band is based on.		Consider OGC review comments provided for Revision 10 to NUREG 1021.		
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.	<p>Team 2: NUREG 1021</p> <p>Develop appropriate guidance to implement the recommendation.</p> <p>Consider OGC review comments provided for Revision 10 to NUREG 1021.</p>	This is covered by items 2.1 and 2.2 which Team 3 provided. The new performance band is not being implemented.	Acceptable

**LLRT Recommendation Section 3
The Administrative Review process for Contested simulator Operating Testing Results**

LLRT Recommendations	OLIT Plan	Implementation Team	Scope of Change	BC Concurrence	
3.1	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. Revise OLMC 0500 to not allow anyone from the affected region or who was associated with the exam administration to be on the panel.	Concur with recommendation.	<p>Team 4: OLMC 0500</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>	<p>Provided guidance for the makeup of the appeal panel(s). This includes cross-regional participation. If an applicant's appeal is related to dynamic simulator scenarios, then Option 3 (appeal panel) shall be used (OLMC-500 Section D.1.b).</p> <p>Guidance added on who is responsible to determine which review option to select (Director of DIRS, IOLB Chief & Staff, non-affected region) (OLMC-500 Section D.1.b)</p> <p>Guidance added on panel composition to ensure</p>	Acceptable

				impartiality (i.e., panel shall not be comprised of anyone from the affected region or any individual involved with the applicant’s licensing examination) (OLMC-500 Sections D.1.d; ES-502 Section D.2.a).	
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 recommendation.	<p>Team 5: HQ Program Oversight</p> <p>Implement as recommended.</p> <p>Provide any NUREG 1021 changes to Team 2.</p> <p>Team 4: OLMC 0500</p> <p>Review OLMC-0500 for possible changes for claim of bias/prejudice related to exam administration.</p>	<p>Implemented as suggested.</p> <p>Team 4:</p> <p>Provided guidance for applicant submitted claims of bias/prejudice related to examination administration (MD 8.17, “Licensee complaints against NRC employees,” provides guidance) coincident with the request for administrative reviews and hearings (OLMC-500 Sections C.1, C.2, E.2.b, E.3.b).</p> <p>Team 5:</p> <p>Link NUREG 1021 changes to approved OLMC-500</p>	<p>Acceptable</p> <p>Clarify actions for immediate re-examination.</p> <p>Clarify what our actions would be if this comes up during administration of the examination, continue with exam or not.</p>
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	Concur with recommendation to formally document contested items.	<p>Team 4: OLMC 0500</p> <p>Implement as recommended.</p> <p>If change involves NUREG 1021 change then forward to Team 2.</p>	<p>Provided guidance that upon receipt of an applicant’s request for administrative review, IOLB will request the affected region to submit their review of the contested items within 15 working days from the Director of DRS to the Director of DIRS for consideration by the reviewer(s) (OLMC-500 Section D.1.a(i)).</p> <p>Provided guidance that if the</p>	<p>Acceptable</p> <p>Discuss comment regarding contacting the applicant if the appeal review determines there is a newly identified critical task. This would provide the applicant the ability to appeal this item again.</p>

	an additional written response articulating any further opposing view. This additional response shall be from the Regional Administrator to the Director NRR.			administrative review overturns the proposed license denial, DIRS will afford the affected region an additional opportunity to provide a formal written response articulating any further opposing view from the Regional Administrator to the Director of NRR. (OLMC-500 Section D.1.f and D.2.c).	We chose not to incorporate this concept because the applicant has the ability to request a hearing. Consider adding into the process to formalize questions to the Region or Licensee.
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.	Team 4: OLMC 0500 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). Ensure guidance addresses all types of appeals.	OLMC 0500 revised to only look at contested items (ES-501 Section D.3.c & OLMC-500 Section D.2.d) Provided guidance that a new error may be identified as a direct result of the contested item review only (OLMC-500 Section D.2.d). OLMC-500 guidance expanded to address all types of appeals (OLMC-500 Section D.2.d, E.2.b).	Acceptable Consider using “contested error” vice “contested items.”
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	Concur with recommendations, however, add guidance which addresses any licenses held in abeyance for possible negative impacts.	Team 4: OLMC 0500 Consideration needs to be given to 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. Ensure guidance addresses all types of appeals.	OLMC-500 and ES-501 revised to address licenses held in abeyance for all types of appeals (OLMC-500 Sections D.2.d, E.2.b, Attachment 3; ES-501 Section D.3.c & Attachment 5).	Acceptable

	revoke a license that already been issued.				
3.6	Both the examiner standard and OLMC-0500 should contain guidance that documentation be handled in accordance with MD 3.4 and Inspection Manual Chapter (IMC) 0620, Inspection Documents and Records. The examiner standard 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 OLMC 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.	Team 4: OLMC 0500 Implement as recommended. Ensure the team addresses the additional procedure identified in the recommendations (IMC-0620). Determine need to partition OLMC-0500 as recommended. Provide any changes to NUREG 1021 to Team 2.	Proposed revision to OLMC-0500 only. Did not pursue partitioning the OLMC. The OLMC is logically laid out. OGC recommended using the process described in MD 3.53 "NRC records and document management program" as the governing document. This was based on these documents being the most relevant reference (not MD 3.4) since the material may be required to support hearings. No changes to NUREG 1021 (OLMC-500 Section E.1.j).	Acceptable Ensure salient points are brought out in training. Determine if we need to update the NUREG to refer to MD 3.53 for handling documents for appeals/hearings.
3.7	Revise OLMC 0500 to address the use of	Concur with recommendation.	Team 4: OLMC 0500	Incorporated changes (OLMC-500 Sections	Acceptable

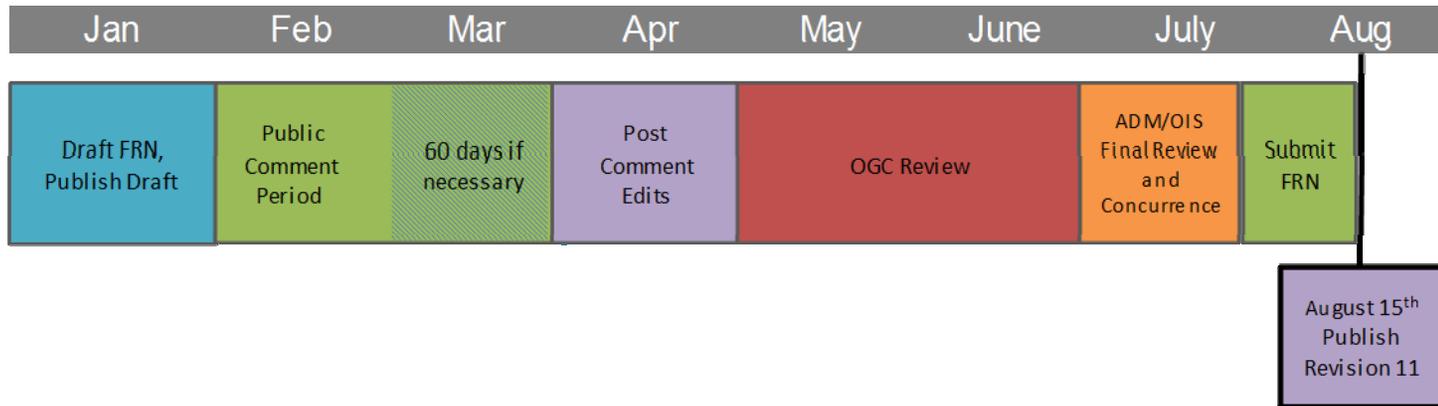
	video recordings.		Implement as recommended.	E.1.f(vi) & E.1.g).	Ensure we indicate that contested items only are reviewed.
LLRT Recommendation Section 4 Examination Team Composition					
LLRT Recommendations		OLIT Plan	Implementation Team	Scope of Change	BC Concurrence
4.1	A re-examination following an allegation of conflicts of interest or bias shall be observed by a branch chief or other management official IAW IMC-0102, Oversight and Objectivity of Inspectors and Examiners at Reactor Facilities.	Concur with recommendation	<p>Team 5: HQ Program Oversight</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>	<p>Submit 1021 change to Team 2</p> <p>Review and, if necessary, submit change for IMC-0102.</p>	Acceptable
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	Concur with recommendation.	<p>Team 4: OLMC 0500</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>Team 2: NUREG 1021</p> <p>Implement recommendation and revise NUREG 1021 (i.e., ES-303s, waiver criteria, etc.)</p>	<p>Provided guidance for the NRC to be informed of any potential operating test retake applicant's during the telephone call 5-months prior to the scheduled examination date (ES-201 Section C.2.c).</p> <p>Provided guidance regarding restrictions placed on examiner personnel eligible for participation on a retake applicant's operating test exam. Additionally, the signature for the licensing decision must be a different</p>	Acceptable

	of the retake exam. If a team cannot be assembled in the affected region then examiners from another region shall be used.			person. (ES-201 Section D.1.a).	
4.3	Incorporate case studies.		This is encompassed by item 1.8. Team 5.		Acceptable
LLRT Recommendation Section 5 Review of Interim Guidance to the Conduct of Initial Operator Licensing Examinations					
LLRT Recommendations		OLIT Plan	Implementation Team	Scope of Change	BC Concurrence
5.0	Incorporate Interim Guidance.	Agree that Interim Guidance should be sunsetted.	Team 5: HQ Program Oversight Ensure Interim Guidance has been incorporated.	Interim Guidance to stay in place until NUREG 1021 Rev.11 has been issued.	Acceptable
LLRT Recommendation section 6 Review of 2011 independent Review Team Report					
LLRT Recommendations		OLIT Plan	Implementation Team	Scope of Change	BC Concurrence
6.0			No recommendation.		

2015



2016



NUREG 1021
545 pages
23 sections, 6 appendices