

**From:** Revelle, Carole  
**Sent:** Tuesday, September 29, 2015 10:13 AM  
**To:** Revelle, Carole  
**Subject:** FW: Fwd: White paper  
**Attachments:** Harris 71111 11 White Paper 8-13-15(2).docx; ATT00001.htm

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**From:** Robert Meyer [<mailto:nucbiz@hotmail.com>]  
**Sent:** Monday, September 28, 2015 1:53 PM  
**To:** Sloan, Scott  
**Subject:** [External\_Sender] Fwd: White paper

Sent from my iPhone

**Date:** September 28, 2015 at 12:48:53 PM CDT  
**To:** "'[nucbiz@hotmail.com](mailto:nucbiz@hotmail.com)'" <[nucbiz@hotmail.com](mailto:nucbiz@hotmail.com)>  
**Subject:** **White paper**

Scott,  
You will find the white paper attached.

I would hope that the inspection processes or protocols do not change midstream, unless there has been some change management. This is somewhat disappointing it shows up in a Region II Inspection for the first time. It is this that brings into question the consistency of the NRC inspections and Region-to-Region uniform conditions that govern our programs.

*Bob Meyer*

PROS – Foreign and Domestic Affairs President  
Professional Reactor Operator Society

## NRC LOCT Inspection OE

A new NRC Region II method of determining whether a written question's LOD (Level of Difficulty) is too low for the question to be on an exam is being applied. If this new method is applied to previously administered exams, the industry is subjected to a new standard in written question development which could drive an exam to being unsatisfactory. This could very well lead to green and greater than green SDP findings across the industry.

A Region II NRC inspector took a stance at a Duke site last week that some exam items do not discriminate because with the availability of electronic references and the ability to word search thousands of pages for a key word or phrase. The challenge is based on two fronts:

- a well-crafted search will yield the correct answer making the question a direct lookup or reducing the level of difficulty to trivial.
- distractors not being plausible because they use conditions that are not present in the same reference where the answer is found.

The NRC has taken Duke's feedback (with industry input) on the exam questions, but has not given them resolution on the final determination and indicate that it wouldn't happen while they are on site. (I have attached a white paper that Duke gave to the inspector prior to him leaving the site after the exit.)

I have been in contact with the industry and as Vice-Chair of the License Operator Focus Group (LOFG) reached out to NRR (as was requested by NRR if the industry identified any inspector or regional differences being applied). This was the first time NRR has heard of this new method being applied and will look into the issue. Gregg Ludlam (Chair of LOFG from Exelon) and myself have a scheduled drop in visit with NRR on the NRC recommended changes to NUREG 1021 (Licensing Standard) on September 4th and this subject has been to the topics for discussion.

Duke management had a phone call with the two Region II Licensing Branch Chiefs on 8/13/15 and they acknowledged this was a new method of question evaluation. One of the Branch Chiefs are going to draft an ROI for NRR to provide guidance on how to move forward. Until NRR responds this will remain on the site's quarterly report as an Unresolved Item. Potential outcomes discussed were a change to the 71111.11 IP to create a new standard or the whole thing could just "go away". They had no predictions on NRR's decision timeframe. Currently the NRR office is aware of the situation but the ROI has not been drafted. The Branch Chief mentioned that RII inspectors have good communication and all inspectors are aware of this concern with searchable references and he would expect if this issue is present at other sites for it to be documented and be resolved when the ROI is answered. (One item of note is that we have the same inspector as the one that is pushing this issue at PTN for our LOCT Inspection)

I will continue to stay very engaged with the industry and NRR on resolution of this item and I'm putting together talking points for Gregg and myself for the drop in visit on the 4th. I do have additional insight/detail on this subject so please let me know if you want to have a call or would like additional information.

From an industry leader.