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General Comment

1) The NRC proposes to revise the assessment of initial operating tests by changing the grading from 1, 2, and 3 to 0, 1, 2, and 3 and by eliminating the point back feature. The industry representatives on the operator licensing exam session during the RIC expressed concerns that these changes, without also changing the acceptance level, would significantly increase the tests' failure rate. In NRC-2016-0006-0003 (slides from NRC 02/09/2016 presentation), the NRC reported that applying the new criteria to past tests resulted in about 10 percent more failures. During the RIC session, the NRC provided solid, defensible justification for these changes. However, to guard against unintended consequences in the form of higher than expected failure rates, the NRC should review the administration of initial operating tests after about one year to determine if the test outcomes meet the agency's goals.

2) The abstract of draft Rev. 11 to NUREG-1021 stated "The standards also ensure the equitable and consistent administration of examinations for all applicants." NUREG-1021 contains valuable information on what to do, and what not to do, to help achieve this goal. The proposed changes in Rev. 11 add to this valuable guidance. But the text in the last paragraph on ES-303, page 1 of 19 contradicts this goal and can result in inequities. It states that "If an applicant has a performance deficiency with serious safety consequences, the examiner may recommend an operating test failure even if the grading instruction in Section D would normally result in a passing grade." Likewise, this paragraph also permits the Chief Examiner to recommend issuing a license to an applicant who has failed the operating test. But NUREG-1021 fails to contain even minimal guidance on what constitutes "serious safety consequences." Absent such guidance, it is up to the Chief Examiner to decide whether a performance deficiency does, or does not,

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constitute serious safety consequences. This is the kind of inconsistency invitation that the overall changes to in proposed Rev. 11 seek to eliminate. NUREG-1021 goes to great lengths to ensure applicants are tested on safety matters. For example, paragraph c on ES-301, page 6 of 31 requires K/As for the "operating test should have importance factors of at least 2.5." And paragraph d on ES-301, page 15 of 31 stated that "A scenario [during an operating test] must have at least two critical tasks." Thus, because NUREG-1021 deliberately focuses on K/As having high importance and on critical tasks, it could be inferred that not knowing a single K/A for a task or not nailing a single critical task during a scenario could have "serious safety consequences." Because there is zero guidance in NUREG-1021 on that this term means, like beauty it is in the eyes of the Chief Examiner. That's just wrong. That's unacceptable. That's the very arbitrary and capricious handling that NUREG-1021 seeks to avoid. Consequently, either this provision must be entirely removed from NUREG-1021 or extensive text added to it to give applicants and examiners appropriate guidance on what does, and what does not, have "serious safety considerations."