

As of: 3/31/16 11:23 AM  
Received: March 29, 2016  
Status: Pending\_Post  
Tracking No. 1k0-8ors-hkxr  
Comments Due: April 05, 2016  
Submission Type: Web

# PUBLIC SUBMISSION

**Docket:** NRC-2016-0006

Operator Licensing Examination Standards for Power Reactors, NUREG-1021, Revision 11

**Comment On:** NRC-2016-0006-0005

Operator Licensing Examination Standards for Power Reactors; Extension of Comment Period

**Document:** NRC-2016-0006-DRAFT-0015

Comment on FR Doc # 2016-04748

## Submitter Information

*2/5/2016*  
*EIFR 6301-1*

**Name:** Anonymous Anonymous

## General Comment

See attached file(s)

## Attachments

V.C. Summer Comments

RECEIVED

2016 MAR 31 AM 11:26

RULES AND DIRECTIVES  
BRANCH  
USNRC

SUNSI Review Complete

Template = ADM - 013

E-RIDS= ADM-03

Add= *m. Scheetz (mcs D)*

*T. Kolb (TK)*

Paragraph	Rev. 11 Front section description	Actual wording	Comment
ES-201, C.1.h	Added words "in any way" to the second bullet to specify that a Bank question revised "in any way" needs to be submitted to the NRC as part of the exam submittal based feedback from regional offices.	For those items that were derived by modifying existing bank items in any way, note the changes that were made or submit a copy of the item from which it originated.	The wording "in any way" needs to be eliminated or clarified. If a bank question is revised in the existing test bank to address typographical errors, spacing or minor style or wording issues, the question then becomes the current bank version and can be submitted as such. There is no substantive reason to maintain an accounting of before and after versions when the change is not a significant modification. This results in unnecessary accounting of archived versions, extra volume in the submittal, and the potential creation of virtually equivalent questions in the bank to maintain the "before" version. The paragraph can be clarified by stating that any question that is counted toward the significantly modified category of questions must have the source version included with the submittal.
ES-201, C.1.k	Added clarification that examination comments should be reviewed with NRC and licensee over the phone, although it is acceptable to schedule a meeting at the NRC regional headquarters or the licensee site. This incorporates guidance to promote consistency between the regions.	k. The facility licensee shall meet with the NRC (normally the chief examiner) to review and discuss all substantive comments from the quality reviews of the examination outlines and proposed examinations. These meetings will normally be conducted via telephone, but with approval from NRC regional management and concurrence of both parties, may be conducted in the regional office or at the facility	The passage should be revised to eliminate the preference of phone conferencing. There may be a case in which it is more productive or otherwise better suited to meet in person. Eliminating the preference would allow for an easier accommodation of a facility request to meet in person.
ES-201, C.2.g	Replaced paragraph with additional guidance on importance of the preparatory site visit.	g. All assigned examiners should attend onsite validation activities if possible. This is the most efficient and effective means for examiners to become familiar with examination materials and to provide the chief examiner with feedback on the quality of each component of the operating tests. It also serves to orient new examiners with the facility, or to refresh examiners who have previously visited the facility with site-specific details, such as plant layout and simulator operation. There may be circumstances, such as retake operating tests, where validation activities can be conducted onsite just prior to	This passage needs to be clarified. The validation activities specified are part of the preparatory visit and not part of the facility internal validation activities that occur prior to submittals.

Paragraph	Rev. 11 Front section description	Actual wording	Comment
		the scheduled administration date. This alternative to a separate validation week minimizes agency costs and the impact on facility licensee training activities.	
ES-201, C.3.a	Added additional guidance that a new examiner attend validation week. Based on a recommendation from OLIT Team 5.	When assigned to administer operating tests for the first time at a particular facility, the examiner should inform the chief examiner and the responsible supervisor so that arrangements can be made to ensure participation in onsite validation activities as described in C.2.g. If the examiner is unable to attend validation, then the chief examiner and responsible supervisor should consider if an orientation trip to the facility is deemed appropriate.	Same as previous comment for ES-201, C.2.g. This passage needs to specify "during the preparatory visit" to make clear that it is not intended for examiners to attend the facility's internal validation activities.
ES-202, C.1.a	Provided additional guidance to address excusals and deferrals and consolidated references to location and instructions for NRC Form 398 and 396. Revised the instructions for submitting excusals: the retake examination must occur within 1 year of the date that the applicant completed the original examination. Deleted the requirement for excusals to be requested with 1 year of the original exam. This is to match guidance in ES-204 for the same re-take exam process.	If the applicant previously passed either the written examination or the operating test, he or she may request to be excused from re-examination on that portion of the licensing examination. Such excusals are limited to the first re-application and the corresponding retake examination must take place within 1 year of the date on which the applicant completed the original examination.	The change from 'requested within one year' to 'retake within one year' seems too limiting. Time should allow for insertion into next license class. It would be better if the statement said 2 years or next License Exam (whichever is sooner).
ES-204, D.1.a	Added guidance to address excusals and provided examples of what the licensee should submit as justification for an excusal of some examination requirements. Added guidance for when an excusal is appropriate and noted that licensees should use the SAT process to determine and conduct remedial training.	If an applicant failed <i>only</i> one portion of the site-specific initial licensing examination (i.e., either the written examination overall, the SRO-only section of the written examination, the simulator operating test, the walk-through overall, or the administrative portion of the walk-through), the region may excuse the applicant from re-examination for those examination areas that were passed. This is only applicable for the first retake examination and only if it takes place within 1 year of the date on	Request adding to section D.1 to allow excusal of portions passed without NRR/NRO approval: <ol style="list-style-type: none"> <li>1. passing a single portion of the exam without taking the rest of the exam the applicant has passed previously</li> <li>2. changing the excusal time requirement to 2 years or next License Exam (whichever is sooner).</li> </ol>

Paragraph	Rev. 11 Front section description	Actual wording	Comment
		which the original examination was completed.	
ES-302, D.3.n	Added language from FAQ 302.8 for classifying an emergency event at the end of a simulator operating test. The NRC does not require the SRO applicant to complete the emergency classification within the normal event classification period of time during a simulator operating test. Added reference to Appendix D which states that performance of an event classification does not meet the CT criteria.	Because the simulator operating tests for the initial licensing examination are conducted with only one applicant in the SRO position, the NRC does not require the SRO applicant to complete the emergency classification within the normal event classification period of time. In most cases, the applicant is asked to classify the event after the scenario is complete and the simulator is in freeze. As explained in Appendix D performance of an event classification does not meet the CT criteria.	This passage needs to prohibit requiring candidates to provide a timeline of classifications. A real classification in real time would be performed by a Shift Manager in an oversight role. Because the SRO candidate is actually directing shift activities, he or she may miss conditions for the earliest classification(s). If a classification is required, then only the highest level classification at the conclusion of the scenario should be sought and evaluated. A timeline that describes the lowest to highest over the scenario duration should not be pursued.