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Submitter Information

Name: Randal Martin

Address:

1448 SR 333

Russellville, AR, 72802

Email: rmarti3@entergy.com

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General Comment

ES-205 from Draft NUREG 1021 Revision 11 concerning GFE exam dates and frequency:

The current proposed changes state "It is anticipated starting in FY 2017, the NRC will administer the GFE in December, March, and September. Thereafter, the GFE will be administered in March and September only."

This proposed change will place a significant burden on the management of license class sequencing and scheduling for the utilities based on outage schedules and availability of the applicants to systematically learn the fundamentals and then progress to the next sections of the licensed operator course. Also with limited resources due to retirements and attrition, the availability of the GFE exam being limited will likely cause many more eligibility requests from the utilities.

Recommend solutions are

- 1) transition the GFE exam construction and administration over to the utilities similar to the existing initial exam with only the five modified and the five new questions having to gain prior approval from the NRC for the utility to add to the 40 randomly generated 40 questions from the existing bank which is similar to what is currently contained within ES-205.

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2) extend or eliminate the "shelf life" of two years on the GFE exam so the scheduling is less time sensitive for the conduct of the utility's license course.

3) remove the stand alone GFE exam from the initial exam process and allow the outline generation to select GFE topics and associated K/A's from the respective NUREG 1122/1123 as part of the initial written exam development and administration.