

# PUBLIC SUBMISSION

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**Docket:** NRC-2016-0006

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

**Comment On:** NRC-2016-0006-0013

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

**Document:** NRC-2016-0006-DRAFT-0021

Comment on FR Doc # 2016-07907

## Submitter Information

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## General Comment

FENOC Comments on NUREG 1021 Draft Rev 11  
Docket ID NRC-2016-0006

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4/15/2016  
81FR 6301-1

The purpose of this document is to provide comment on the proposed changes to NUREG 1021, Operator Licensing Examination Standards for Power Reactors, Draft Revision 11. The summary of the changes listed in Rev 11 was used as the basis for this review, each item was evaluated for impact as a potential change to the exam development process.

ES 201 Section C.1.f - The NUREG now requires the NRC to prepare the written outlines for the facilities. In many cases, this will be an additional burden on the NRC as well as the facilities in that the Rejected K/A list could be much larger than if the facility prepared the written outline. Not all facilities have the same systems, such as Rod Control and Information System vs. Reactor Manual Control System or HPCI vs. HPCS. Unless the NRC tailors the generation of an outline to each facility, much time and effort will be expended rejecting and agreeing on replacement K/A's. (ES-401 D-1-b p51)

ES 201 Section C.1.f - The NRC generated outlines need to be provided to the utilities earlier than the timeline shown in the NUREG. There is not enough time from the 150 days prior to the exam to develop the written exam.

ES 201 Section C.3.f - The requirement for the NRC to provide the exams to the facility 60 days prior to the exam may not provide adequate time for the facility to review and validate the exam due to constrictions on Operations resources. Comment should address providing the exam materials earlier in the process.

ES 201 Form 201-1- The form delineates when the exam materials are submitted. The 150 day time frame is too short to develop the exam and needs to be modified. The form also has a new item 9 for submitting preliminary waiver/ excusal requests. The final version of this form will need to be incorporated into NOP-TR-1270.

**SUNSI Review Complete****Template = ADM - 013****E-RIDS= ADM-03****Add=**

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ES 202 Section D.1.a (1) States that an RO candidate must have 6 months on the site for which they are licensing. However ES 202 Section D.1.b (1) states that the onsite requirement of the first section is one year not six months. Additionally. ES 204 D.1 I (1) also refers to the onsite RO experience as one year versus 6 months. This may be a typographical error.

ES 204 Section C.2.e - If the intent to address eligibility issues prior to class start or at least 60 days prior to an exam, why will the official notification of granting or denial only be 14 days prior to the exam?

ES 301 Form 301-4 - Rev 10 of the NUREG changed Form ES-301-4, Target Quantitative Attributes (Per Scenario; See Section D.5.d) section, item 6 from "Critical tasks (2-3)" to "EOP based Critical tasks (2-3)". Rev 11 should clarify this.

ES 301 Form 301-7 - NRC grading form to determine Operating exam acceptability. There are several typographical errors on this page:

Form ES 301 -7 on Page 29 of 31 is missing the form title.

Page 28 of 31 item 4 for Admin JPMs implies that they should have Safety Significance, however many of the ADMIN K/As are not related to Safety (i.e Conduct of OPS)

Page 30 of 31 item 2.b the word "difference" should be "different"

Page 30 of 31 does not allow for Non-EOP based critical tasks to be counted towards the scenario minimums, rather they must be EOP based.

Page 31 of 31 Item 2 typo ..."JPM column Nol 5's"

Page 31 of 31 Item 3 typo includes epsilon "" symbol

Page 31 of 31 Item 6 needs spacing corrected

ES 302 D.1.K - Limits the Simulator exam to only one SRO position. Question to the NRC if it is acceptable to have a member of the site staff to role play the Shift Manager position to perform administrative duties such as notifying maintenance or management.

Form ES 403-1 - Was modified to not have the Facility Reviewer sign item 2 since the exam is not complete if comments are submitted. Question, should this include the Grader as well? (Column a)