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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-0022

Comment on FR Doc # 2016-07907

## Submitter Information

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**Submitter's Representative:** Aaron Forsha

**Organization:** Duke Energy

## General Comment

See attached file(s)

## Attachments

Duke Energy Nureg 1021 rev 11 comments

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RULES AND DIRECTIVES  
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SUNSI Review Complete  
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Add= *M. Scheetz (MCS7)*  
*T. Kolb (TRK)*

**Duke Energy Comments on Draft NUREG-1021, Revision 11  
"Operator Licensing Examination Standards for Power Reactors"**

ID	Section, Page, and Line #	Comment	Proposed Resolution
	Appendix D.f page D-7	New 50% overlap requirement will result in less operationally challenging exams. Current exams are designed to have sufficient complexity of events to allow a complete evaluation. This new requirement will drive us to use less complex events that will reduce overall difficulty of exams. We will need to use more address alarm and turn a switch type events to minimize overlap. These events have been previously not allowed to be a major portion of pre-major events.	Decrease to 20% or remove new requirement completely. At the 20% level, a lot less "coordinate with the NRC chief examiner to meet the intent of this section to the extent possible" exemption being used.
	ES-303 Section 1.d; Page 3 of 9, Beginning Line 8	New method of grading TS evaluation opportunities will result in unbalance difficulty between exams. Under current guidelines each event can only have 1 TS evaluation for a design target of 2, with the new requirement some applicants could end up with double or more of others.	Keep Rev-10 design criteria OR add clarification that a single event that requires 2 TS action statements to be entered will meet minimum design criteria. While this solution will not completely eliminate the concern, it makes it much more manageable when designing quality exams.
	ES-303 Section D.2.b	Changing the lowest rating factor from 1 to 0 is unnecessary and will require facilities to expend resources aligning current practices and procedures to the change. NRC examiners and the NUREG already recognizes that sometimes the grading does not match the performance and judgment is required for a licensing decision. See ES-303 Section 2, Page 1-19 Lines 4-8 for further details. This change will require a lot of time/money for what experience has shown is less than a 1% occurrence.	Leave grading scales as they are and make it a practice of using the guidance in ES-303 Section 2, Page 1-19 Lines 4-8 to resolve conflicts between what the grade is the judgment of the examiner.

ES-303 D.2.b	<p>The proposed language of Revision 11 eliminates the allowance to give points back for noncritical errors. This allowance was necessary to provide a candidate who is competent but makes just a few errors to be penalized without relief.</p> <p>During a scenario an applicant can have multiple chances to show competency in an area. Some scenarios provide more than the expected three chances and therefore can fail the applicant who is at the minimum standard. The practice of allowing points back can provide the examiner a better picture of the candidate's ability. Due to the number ratings being revised to a more stringent criteria, this is even more important to the rating of the candidate than in previous exams.</p>	<p>Retain the wording from Revision 10, "If an applicant makes a single error related to a rating factor, circle an "If an applicant makes two errors related to a rating factor, circle an "RF Score" of "1" for that rating factor unless the applicant correctly performed another activity (or activities) related to the same rating factor, in which case the "RF Score" shall remain at "2." In either case, a justification of the "RF Score" shall be documented on the applicant's Form ES-303-2. For example, a score of "1" shall include documentation such as "the applicant correctly performed no other activities related to this RF during the simulator operating test"; whereas a score of "2" shall include documentation such as "the applicant correctly performed another activity associated to this rating factor". As stated above, if an error is related to a critical task then this requires an "RF Score" of "1."</p>
ES-303 D.2.b.	<p>In the proposed revision, a missed critical task (CT) would result in a 3 point reduction with a score of 0. This is not a fair evaluation of the applicant. Revision 10 had a decrease of 2 points for this issue and since a 0 has more consequences on the overall grade, consideration should be given to a 2 point deduction. If the applicant has more issues past 1 Critical error, they will appear and be graded in other areas, which would then lead to failure of the applicant.</p>	<p>Change "a missed CT results in a 3-point deduction for an 'RF Score' of '0.'" to "a missed CT results in a 2-point deduction for an 'RF Score' of '1.'"  Revise other guidance in the NUREG to align with this comment.</p>
ES-401 D.2.c. and Form ES-401-6	<p>Since percent of questions was removed from previous wording in D.2.f. and the correct number of questions was inserted, instead of saying "between 50 and 60 percent of the questions on the RO examination and at least 50 percent of the questions on the SRO-only portion" re-write the sentence using the number of questions instead of percent.</p>	<p>Change the wording to "between 38 and 45 questions on the RO examination and at least 13 questions on the SRO-only portion ...."</p>
ES-401 E.2	<p>Considering the workload of NRC chief examiners, the practice of "The chief examiner shall consolidate the comments from all NRC reviewers and submit one set of comments to the author or facility contact." Can cause significant delays in the sites receiving the 401-9 comments. These delays often challenge our procedures and processes.</p>	<p>Change exam review feedback to allow partial 401-9's to be provided to the sites to allow the exam team to begin processing them sooner.</p>