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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-0027

Comment on FR Doc # 2016-07907

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RULES AND DIRECTIVES
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US170

General Comment

Tennessee Valley Authority comments on NUREG-1021 Rev. 11 Draft

Attachments

TVA Comments to NUREG 1021 R 11

SUNSI Review Complete
Template = ADM - 013
E-RIDS= ADM-03
Add= M. Scheetz (mcs7)
T. Koib (TCK)

TVA Corporate NUREG-1021 Rev. 11 Comments and proposed resolutions

Comment Number	NUREG Section	NRC Proposed Change/ Proposed Resolution/comment		Justification
GENERAL				
	Change Log	ES-401 C.1.a entry	Description of what's in ES-401 doesn't match what's in ES-401	ES-401 only talks about written outlines.
	Change Log	Form 403-1 entry	Should say "ES-403-1" vice "ES-401-3"	Typo
ES-201				
	ES-201, Form ES-201-1 and throughout	<p>Overhaul the Examination timeline to have target dates for activities start sooner. Also, split the exam submittal into two parts with the chief and station determining which will be delivered first. Further, add the pre-submittal items to the timeline so there is enough time to make course corrections based on this early feedback</p> <p>Examples include:</p> <ol style="list-style-type: none"> 1. 150 day phone call would be at 300 days 2. Outline delivery at 270 days 3. Corp Notification letter at 240 days 4. Outline and pre-submittal items at 120 days 5. Outline and pre-submittal feedback at 105 days 6. First part (op test or written) at 90 days 7. Reviews completed sooner 8. Etc. (see attached) 		<p>Allows the station and chief examiners to plan work better. Currently, there is always a rush at the end of the process to get the exams, especially the written, reviewed, revalidated and approved prior to the exam dates. Expanding the timeline in the NUREG to align more closely with what stations and chief examiners are actually doing would improve exam quality and allow adequate time to find and fix issues without running out of time.</p> <p>It is not desirable to have the written exam still undergoing review and approval when the operating test starts. It also detrimentally impacts exam quality.</p>
	ES-201 C.1.k	Exam comments should be reviewed by phone.	State "These meetings will normally be conducted via telephone. Based upon a	Communicate the preference without the need to incorporate branch chief approval, station

			request by the facility or region, a face to face...."	concurrence. Additional admin burden to establish such a formal process for how and when to meet to discuss comments.
	ES-201 C.2.d	"The regional offices should also keep the facility informed of the dates by which the region expects to provide its comments regarding the licensee's submittals."	"The regional offices shall also keep the facility informed of the dates by which the region will provide its comments regarding the licensee's submittals as documented on Form ES-201-1"	The NRC should set and respect deadlines for returning comments. The proposed expanded timeline provide enough time to thoroughly review and comment. All parties involved need to be held to deadlines.
	ES-201 C.2.h		Expand to 90 days	Allow region to approve up to 90 based on split exams, large classes, possibility of going to two GFE exams per year.
	ES-201 C.2.j	"After the chief examiner has verified that the necessary changes and corrections have been made, the responsible supervisor will review..."	"After the chief examiner has verified that the necessary changes and corrections have been made, the chief examiner will return the exam to the facility for any facility-required final validation in order to ensure that revisions made during the review process have not negatively impacted the operational and discriminatory validity of the exam. Once the facility has performed final validation of the exam, the responsible NRC supervisor will review..."	Many facilities require a final validation of the exam following the NRC/facility review and revision session. This final validation ensures that the product is fair and retains operational and discriminatory validity. During the review process, nearly all exam instruments have been changed to various degrees and, experience has shown, even seemingly insignificant changes can seriously impact the validity of the product. It is important to ensure no flaws were inadvertently created during the revision process.

	ES-201 C.2.l	Approximately 7 days...	This should be at least 21 days.	Seven days is not sufficient to address any potential issues. Having an additional 14 days to address potential issues and concerns would help ensure the facility and the NRC has addressed all concerns before the first day of the exams.
	ES-201 C.3.g	Alignment with C.1.k	The second paragraph of C.3.g should be a duplicate of C.1.k to ensure the requirements are consistent.	
	ES-201 D.2.b Fourth bullet	“development of examination bank questions if the intent is to use them on the next NRC examination – If questions are simply being developed to expand the size of the question bank, then they would be treated as any other bank item and subject to the other criteria in NUREG-1021 (e.g., repetition from the audit exam).”	Remove bullet as it add confusion or clarify the intent of the item. “development of examination bank questions for any use other than the current NRC or Audit examinations. -questions for the facility’s course banks may be developed but may not be added to common banks until the NRC exam has been administered.”	This item was added to address OLPF 401.32. The intent of the original question is not clear in the OLPF document since the referenced “instructor” may or may not be on exam security. As such, it cannot be determined what the context of the “use” referred to in the question is. As such, the proposed change is confusing and contradictory. Additionally, it is not clear what the “next” NRC exam is, does this mean the exam under development? It cannot, since development of questions for the exam under development is obviously an allowed activity. The outline for the “next” exam has not been drawn yet so any item developed outside the

				<p>current sample plan may or may not fit onto the next exam.</p> <p>Given the possible consequences from misunderstanding this bullet, it is recommended that the bullet be deleted until any allowed activities being described can be described with greater accuracy.</p>
	ES-201 D.2.b	<p>"Supervisors and managers having knowledge of the examination content may continue their general oversight of the training program for the license applicants, including the review of examinations, quizzes, and remedial training programs, as well as the counseling of applicants concerning non-technical issues. However, those supervisors and managers may not provide any technical guidance, training, or other direct feedback regarding the content of those examinations, quizzes, or programs in a manner that might compromise the integrity of the licensing examination as defined in 10 CFR 55.49."</p>	<p>"Supervisors and managers subject to an exam security agreement may continue their general oversight of the training program for the license applicants, including the review of examinations, quizzes, and remedial training programs, as well as the counseling of applicants concerning non-technical issues. However, those supervisors and managers may only provide general feedback regarding quality of those examinations, quizzes, or programs and may not make specific contents regarding content of these in order to maintain the integrity of the licensing examination as defined in 10 CFR 55.49."</p>	<p>Clarify guidance to ensure management can perform oversight functions without jeopardizing security.</p>

	ES-201-1 Form	Pre-submittal items not on 201-1 Form	Add pre-submittal items to , including dates for when they should be given to NRC and when NRC is expected to return them. (provided at T-120 with comments due back to facility at T-105)	Ensure that this practice is consistently applied across the regions/chiefs.
	ES-201-1 Form	-120 day item, revised written exam outline due	Remove this line item, add the 401-4 form to the -90 day operating test outline block.	This is not currently done in RII, which has provided the written outlines for several years. Before the written outline is provided, it is checked and approved by the NRC. The facility then reviews the outline when received and any changes made after this are made with the chief examiner's approval and documented on 401-4, Rejected KA list. The 401-4 should be submitted along with the written outlines as is done now with the understanding that the 401-4 will not be complete until the final exam is approved.
ES-202				
	ES-202 C.2.b Paragraph 4	The word "in" is duplicated in the last sentence.		Typo
	ES-202 D.1.b.(1)	Refers to "1-year onsite"	Should be 6 months to align with D.1.a.(1)	
ES-204				
	ES-204 C.2.b last paragraph	The region does not require written concurrence from	The region does not require written concurrence from	NRR/NRO needs to provide an oversight role to ensure regional consistency.

		NRR/NRO to deny an applicant's excusal or waiver request, but it should discuss its decision with the operator licensing program office before informing the applicant; formal concurrence may be desirable in some cases.	NRR/NRO to deny an applicant's excusal or waiver request, but it shall discuss its decision with the operator licensing program office before informing the applicant; formal concurrence may be desirable in some cases.	
ES-205				
ES-301				
	ES-301 B. third paragraph	U.A Nuclear Regulatory Commission	U.S Nuclear Regulatory Commission	Typo
	ES-301 B.1, last line	States "The 'Administrative Topics' are administered in a one-on-one...format..."	Remove "one-on-one" since they are can be administered in a group format.	Align guidance with practice.
	ES-301 D.3.c	"All SRO Administrative JPMs must be written at the SRO level."	"A majority of SRO Administrative JPMs must be written at the SRO level."	Mandating that all SRO admin JPMs be written at the SRO level eliminates testing any RO admin topics. Since RO tasks and duties are part of what SROs are being tested on, this requirement eliminates testing this aspect. Additionally, this adds additional work to exam preparation for little added benefit.
	ES-301 D.5.a paragraph 2	Allowance to place SRO-I at new facilities at either BOP or ATC	Extend this allowance to all plants.	This is not consistent with uniform conditions. Both BOP and ATC positions at current plants give ample opportunity to evaluate SRO competency 3. Both positions have

				adequate manipulations to evaluate board operation. Each candidate needs to demonstrate the ability to perform a variety of attributes on the Transient and Event Checklist (Form 301-5), so long as this requirement is met, they should be able to be at either position.
	ES-301 D.5.b, ES-201-2, Item 4.d, et al	To maintain test integrity, every applicant shall be tested on at least one new or significantly modified scenario that he or she has not had the opportunity to rehearse or practice. A significant modification means that at least two events or conditions have been replaced or significantly altered such that operators will not recognize them from the previous two NRC initial licensing operating exams.... The final product of all required scenarios should not contain more than 50 percent of the events (excluding the major events) from the previous two NRC initial licensing exams. Events found in spare scenarios will count as previously-used if they were made publicly available in ... (ADAMS). If a facility	To maintain test integrity, every applicant shall be tested on new or significantly modified scenarios that he or she has not had the opportunity to rehearse or practice. A significant modification means that at least two events, malfunctions or initial conditions have been replaced or significantly altered such that operators will not recognize them from the previous two NRC initial licensing operating exams. Any repeated major events from the last two tests should be changed so as to alter the course of action (within the emergency procedures) for the given scenario(s). It is expected that all major events would be broadly sampled	The addition of percentage-based overlap requirements for scenarios is overburdening to exam development teams when the goal of "maintaining test integrity" can be accomplished through more effective, qualitative means. Application guidance can be provided for current, sufficient restrictions without the need to create additional requirements. Additionally, these restrictions may, in effect, make the exams more predictable by limiting the scope of what may be examined.

		<p>encounters difficulty ... Additionally, ...Furthermore, any other scenarios</p>	<p>over the course of several exams, and that no major event will routinely be omitted without justification.</p> <p>Furthermore, any other scenarios that are extracted from the facility licensee's bank must be altered to the degree necessary to prevent the applicants from immediately recognizing the scenarios based on the initial conditions or other cues.</p>	
	<p>Form ES-301- 4</p>	<p>Line 9 and 13 Revisions</p>	<p>Remove revisions, replace with a qualitative check of the scenarios with the previous two NRC exams ensuring sufficient diversity.</p>	<p>Line 9: As noted above, restricting non-major item use in this way is too restrictive and unnecessary. The chiefs can (and do) evaluate the current and previous exams and determine whether they are sufficiently diverse.</p> <p>Line 13: If it is desired to make this an actual criterion, it should be consistently applied to tech spec calls, events seen, scenarios performed, etc. This check is already accounted for on the 301-5 forms and the quantitative attributes on the bottom of Form ES301-4 which makes line 13 redundant.</p>

	Form ES-301-7	Added Operating Test Review Worksheets	Remove the forms	These forms are an unnecessary burden on the examiners and the facility, just extra administrative paperwork with little real value.
ES-302				
	ES-302 D.3.h	Examiner's now have to initial all charts	Remove the requirement for examiner to initial charts.	Unnecessary burden, already takes an excessive amount of time between scenarios to reset the simulator.
	ES-302 D.3.n	"...applicant is asked to classify the event..."	Emergency event classification is generally evaluated in the Admin JPM section. Applicant may be asked to classify the event following the scenario.	This practice is not at all consistently applied. This is typically done via the Admin JPM. Also, the classification is often escalated throughout the scenario, so classification accuracy and questioning the candidate after the event may not provide a realistic assessment of the candidate's ability to perform the function.
ES-303				

	ES-303 D.1.d	Guidance to treat every missed TS entry as an individual performance deficiency	Either grade them as a group associated with a specific component/instrument failure in the D-1 form or limit the number of individual items that can be included in a given scenario.	<p>There are several issues with this:</p> <ol style="list-style-type: none"> 1. Candidates on N+1 will have many more opportunities for failure than those who are not. 2. Events/failures with complex TS calls will greatly expand the list of tech specs which must be identified. 3. An SRO candidate performing as SRO during a complex scenario plus an N+1 could have 15-20 TS calls to make, with each mistake counted as a full-point deduction. Another candidate at the same facility who has more straightforward TS calls and no N+1 might only have two or three calls to make. Needless to say, this violates the concept of uniform conditions.
	ES-303 D.1.d	Clarification that there is no limit to the number of rating factors for a single performance deficiency	<p>Revert to Rev 10 wording, which allows only two rating factors to be impacted.</p> <p>Performance deficiency should be counted against rating factor which is most (relevant) and could potentially be assigned to a</p>	The LLRT recommended limiting an error to a single competency to promote consistency in grading among examiners. Leaving it open in an unlimited fashion, therefore, could promote inconsistency.

			second factor for significant deficiencies with solid written justification	
	ES-303 D.2.b and elsewhere	Changing grading scale to 0-3 from 1-3	Leave grading scale at 1-3. Consider possible options for expanding the grading scale in the next revision to 1021, for example, expand the band on both ends to 0-4, for example.	Given that there is broad agreement that the current grading scheme is adequate to determine between competent and non-competent operators, there is no justification to arbitrarily alter the grading scale downward without adjusting the pass criteria.
5	ES-303 D.2.b	The proposed language of Revision 11 eliminates the allowance to give points back for noncritical errors. This allowance was necessary to provide relief for a candidate who is competent but makes a few noncritical errors.	Retain the wording from Revision 10 and the interim guidance. Since the ASLB review board hearing, no issues have been found while using this guidance.	Since the ASLB review board hearing, no issues have been found while using this guidance. During a scenario, an applicant can be provided multiple opportunities to show competency in an area. Scenarios provide many more than the minimum number of opportunities and therefore can fail the applicant who is at the minimum standard. For example, there may be 20 control board operations on an NRC exam for a given candidate. The candidate could perform at a 90% rate and be at a 1. The practice of allowing points back can provide the examiner a better picture of the candidate's overall ability. Due to the number ratings being revised to more stringent criteria, this is even more important to the rating of the candidate than in previous exams.

6	ES-303 D.2.b	In the proposed revision, a missed critical task (CT) would result in a 3 point reduction with a score of 0.	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.	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.
ES-401				
	ES-401 C.1.a and D.1.e (also in ES-201)	Review and submit a revised outline	Remove the requirement for the facility to submit an outline that the NRC is responsible for generating.	When the facility gets an outline, it is already approved by the NRC. If the facility wants to change it, as noted elsewhere in the NUREG, it is cleared through the chief. This "re-submittal" essentially makes the facility responsible for a product they didn't create and doesn't "own."
	ES-401 D.1.b Next to last paragraph	Specifies that all KAs will be requested from the chief examiner	Add an allowance for another chief to provide a KA if the chief is not available.	Sometimes the assigned chief isn't available and KAs need to be changed.

	ES-401 D.2.f Bullet 2	"...randomly select from among the available questions..."	Delete this bullet entirely	Randomly selecting among "available questions" is not necessary nor desired since the KA has already been randomly selected and since there is always "an appropriate basis" for selecting a specific question as noted in the paragraph. Invariable, one question will be a "best fit" for the KA and the test. The content validity concern is addressed by randomly selecting at the KA level.
	ES-401 D.2.f Bullet 3	Information from OLPF 401-25	Remove the information.	The clarification is unnecessary and confusing. "...without reference to a bank..." should be "without referring to a bank" and "not previously exposed at the facility" should be removed as this implies that you could take a bank question from somewhere else and , since it hasn't been "exposed at the facility", it's a new question. This is, obviously, erroneous.
	ES-401 D.2.g	Optional distractor analysis	Make the provision of distractor analysis mandatory	The facility should be required to provide justification for answers and distractors to minimize problems with the technical and psychometric attributes of the questions.

ES-401 E.2.c	Question sampling	Remove this option or expand it to allow the chief to sample fewer or sooner without being so prescriptive	Since the whole exam will be reviewed and the NRC and facility want to come to the same place with a fair and discriminatory exam, the chief should be allowed to sample, return for like-kind issues, pre-review as desired, return questions in batches so the facilities can be working on some questions while the rest are being reviewed, etc.
ES-401 Form 5	Question History Note	Remove "optional..." note due to change in ES-201 C.1.h	
ES-401 Form 6	Revision of Step 7	Simply say "at least 50 percent of the ...SRO-only portion...are written at the C/A level" and leave it.	The remainder is just information and doesn't enhance understanding.
ES-401 Form 8	Applicant Signature Block	Fix alignment	
ES-401 Form 9 and elsewhere	Job Content Errors	Change "Errors" to "Flaws".	Flaw is a more technically accurate and applicable word. Further, it separates this concept from the concept of candidate error.
ES-401 E.2.e, first paragraph	Upon supervisory approval, generally at least 21 days before the examinations are scheduled to be given; the chief examiner will review the written examinations with the facility licensee in accordance with ES-201.	Upon supervisory approval, generally at least 45 days before the examinations are scheduled to be given; the chief examiner will review the written examinations with the facility licensee in accordance with ES-201. At least 10 days prior to the review meeting, form 401-9 will be supplied to the utility."	Align guidance with practice. Encourage examiner consistency since the actual 401-9 forms are not always provided to the facilities. 10 days allows sufficient time for the facility to review the comments and properly prepare for the meeting.
ES-401N			

	All		Incorporate 401N guidance into 401	Having two nearly identical attachments, with duplicate forms, SRO-only guidance, etc. seems ill-advised since most changes to one have to be applied to both, risk of referring to the wrong section, etc.
	See Above		Applicable comments to ES-401 should be applied to ES-401N	
ES-402				
	ES-402 B	Administration of written	Last sentence should read "Generally, written exams are administered by the facility licensee in accordance with ..."	Align guidance with practice, it doesn't matter who writes the exam, the facility generally administers it.
	C.1.g	Added regulation information	Remove the added words or make their intent clear.	The words that were added don't add clarity. What is the connection between "notice of hearing" and the facility sending a letter to withdraw applications? If there is an important point that needs to be made with respect to the withdrawal letter, the added material should be rewritten so that it is understandable.
ES-403				
	ES-403 D.1.a	First paragraph	Change paragraph to match practice. No changes are made to the key or the exam without the chief's express consent.	D.1.a implies that the facility is making decisions regarding the acceptability of the post-exam comments or recommendations and adjusting the key based on these comments during the grading process. In reality, it doesn't happen this way.
	ES-403 D.1.b Bullet 5	it's	its	The incorrect form of "its" is used.

ES-501

	ES-501 C.1.a	"The facility licensee shall refrain from communicating results of the written examination with the NRC until the operating examination has been administered to each applicant."	The facility licensee shall refrain from communicating results of the written examination with the NRC exam team until the operating examination has been administered to each applicant. Any issues which arise with the written exam prior to the completion of the operating test should be reported to and discussed with the regional branch chief.	Facilities need to have an NRC person to call if there are issues which need to be discussed and resolved.
	ES-501 C.1.b	Changed "should" to "shall"	Remove section C.1.b	Will there ever be a time when C.1.b would really be applicable? It would not be possible to have an exam with no involvement from the facility due to direction elsewhere in the NUREG. It looks like the only real difference in intent between Section a and Section b is with respect to submitting applicant comments. Just make it required, since the facility always would send comments anyway, and remove C.1.b.

	ES-501 C.2.c second paragraph	"...the regional office should ask the facility to explain..."	Remove this section or at least this sentence.	The NRC reviews and approves the examinations that are proposed by the facility. Once approved, the NRC "owns" the examination. Since the level of involvement by the NRC is so significant, both parties are responsible for the quality of the content and both parties should have to answer why there are so many post-exam changes. Further, these questions shouldn't count against the facility in the 20% tally for the same reason.
	ES-501, D.2	Review requirements	Preclude reviews completed by the same person. This seems to contradict D.3.a of this ES.	It is important to maintain independence. No one can independently check their own work.
	ES-501 D.3.h	Clarification regarding applicants who take part of an exam	Change to "If an applicant takes any part of a licensing exam and subsequently withdraws the application prior to exam completion, the applicant will receive a denial letter."	Edit for clarity.
	ES-501 E.1.b fourth bullet	"written...JPM..."	This sentence combines two ideas, it should be fixed.	As noted above, copies of actual JPM administered should be returned.

	ES-501 E.3.a	Evaluation of the acceptability of test material	Reduce administrative burden by limiting these activities to a bare minimum which communicates the needed information to the utility to fix future submittals.	It should not be necessary for the chief examiner to check, evaluate, calculate, fill out forms and generate paperwork simply to say "The exam did or did not meet our quality expectations when submitted." Just allow them the latitude to make that determination with the branch chief's approval and eliminate all of this overhead which doesn't improve the exam or make the process more effective or efficient.
Appendix C				
	B.3	Linked critical step performance with verifiable actions	Remove this link	<p>The statement "In general, critical steps should consist of verifiable actions." is true but misleading. There are a variety of critical steps which are NOT verifiable actions but should still be used as the basis for JPM failure.</p> <p>If, for example, there is a procedure step to have a motor control center breaker closed or opened by a field operator, such as the case of isolating cold leg accumulators, the examinee cannot complete the task without having the field operator close the breaker. This is a critical step but NOT a verifiable action.</p> <p>If it is desired to put a link to verifiable actions in here, then the</p>

				discussion needs to be more robust and contain some examples of critical steps which are NOT VAs.
Appendix D				
	C.1	Scenario Overlap attribute	Remove	As noted previously, this should be done differently, preferably as a qualitative check by the facility/chief to verify overlap does not impact exam fairness/predictability.
	C.2.j	The new "Note:" states "An unintentional RPS or ESF actuation does not equate to a failure to perform a CT."	This section needs to be re-written for clarity. It is not at all clear what we are intended to do with this information.	<p>It might equate and it might not. Saying "does not equate" does not mean "may or may not".</p> <p>It is then directly contradicted by the following underlined paragraph: "the critical aspect of an unintentional...RPS or ESF actuation is to ensure that they do not occur..."</p> <p>Further, the following paragraph describes a concept of Overall CTs which will require predicting how many of these theoretical RPS/ESF actuations will be prevented by proper operation of the control boards?</p> <p>For the examiner, it adds a layer of complexity and subjectivity that seems undesirable.</p>

	D.1.c	Added details for elements of critical task performance standard.	Rewrite for clarity.	<p>This sections asks examiners to predict what action someone may have taken in the future and whether or not this previously corrected latent error could have impacted or did impact the outcome of the scenario.</p> <p>The reasoning behind expanding the application of the critical task concept is understood but in boundary cases, the potential for relying on alternative history will be very real. You can't know what someone would have done or what they would have found or which of their own errors they would have corrected if that other guy was just a little slower. This whole process is open to subjectivity.</p> <p>In the ESFAS pump example, what is the performance feedback to the applicant who took the wrong action and was corrected by another? The pump wasn't required until 30 minutes after the correction and the error was never made, so the performer is deprived of performance feedback from the plant. There was never any indication to the performer that his action/inaction had caused the plant to degrade since the condition where it matters hasn't happened yet. For this reason alone, these cannot be assigned as CTs.</p>
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	D.2	Clarification regarding event classifications	State "EP classifications are not Critical Tasks because they do not provide performance feedback to the performer."	Clarification is confusing.
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WORKING EXAM PREP CHECKLIST PROPOSAL, FORM ES-201-1

Proposed Target Date (R. 11)	Proposed Step #	Task Description (Changes/Additions in Red)
-330 (180)	1.	Examination administration date confirmed (C.1.a; C.2.a and b)
-300 (150)	2.	NRC examiners and facility contact assigned (C.1.d; C.2.f)
-300 (150)	3.	Facility contact briefed on security and other requirements (C.2.c)
-270 (150)	4.	NRC developed written examination outline, ES-401-1/2 or ES-401N-1/2, and ES-401-3 or ES-401N-3, sent to facility contact (must be on exam security agreement) (C.1.e-f, C.2.h, C.3.d and e)
-240 (150)	5.	Corporate notification letter sent (C.2.e)
-240 (120)	6.	Reference material due for NRC prepared exams, only (C.1.e; C.3.c; Attachment 3)
-150 (120)	7.	Revised written examination outline due including ES-401-1/2 or ES-401N-1/2, and ES-401-3 or ES-401N-3 and ES-401-4 of ES-401N-4 (C.1.e and f, C.3.d)
-150 (60)	8.	For NRC-authored exams, written exams delivered to facility licensee for review and validation. (C.1.i)
-120 (90)	9.	Operating examination outline(s) and other checklists due, including Forms ES-201-2, ES-201-3, ES-301-1, ES-301-2, ES-301-5, ES-D-1, as applicable (C.1.e and f; C.3.d) Presubmittal items due
-105 (85)	10.	Operating examination outline(s) reviewed by NRC and feedback provided to facility licensee (C.2.h; C.3.e). Not applicable for NRC prepared exams. Feedback provided on presubmittal items
-90 (60)	11.	Proposed operating tests (or written exam, as agreed to by station and chief examiner) due
-75 (45)	12.	Operating test (or written exam) reviews completed, feedback provided to licensee. (C.3.f)
-75 (60)	13.	Proposed written exams (or operating tests, as agreed to by station and chief examiner) due
-60 (45)	14.	Written exam (or operating tests) reviews completed, feedback provided to licensee. (C.3.f)
-60 (60)	15.	Preliminary waiver/excusal requests due (C.1.m; C.2.i; ES-202)
-45 (21)	16.	Examination approved by NRC supervisor for facility licensee review (C.2.h; C.3.f and g)
-45 (21)	17.	Examinations reviewed with facility licensee (C.1.j and k; C.2.g and h; C.3.g)
-30 (30)	18.	Preliminary license applications (NRC Form 398's) and waiver/excusal requests due (C.1.m; C.2.i; ES-202)
-30 (7)	19.	Proctoring/written exam administration guidelines reviewed with facility licensee (C.3.k)
-21 (14)	20.	Written examinations and operating tests approved by NRC supervisor (C.2.j; C.3.h)
-21 (7)	21.	Request facility licensee management feedback on the examination. (C.2.l)
-14 (14)	22.	Final license applications due and Form ES-201-4 prepared (C.1.m; C.2.j and k; ES-202)
-7 (7)	23.	Final applications reviewed; 1 or 2 (if >10) applications audited to confirm qualifications /eligibility; and examination approval and excusal/waiver letters sent (C.2.k; Attachment 5; ES-202, C.2.f; ES-204)
-7 (7)	24.	Approved scenarios and job performance measures distributed to NRC examiners (C.3.i)