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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-0028
Comment on FR Doc # 2016-07907

Submitter Information

Name: Kenneth Fredrickson
Submitter's Representative: Robert S. Bement
Organization: STARS Alliance LLC

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General Comment

STARS Alliance LLC Comments on Draft Revision 11 of NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," 81 Fed. Reg. 6301; Docket ID NRC-2016-0006.

See attached Letter.

Attachments

STARS-16001 May 4 2016

SUNSI Review Complete
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Add= M. Scheetz (mcs7)
T. Kolb (TCK)

STARS Alliance

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Alliance Members:
Callaway Energy Center
Diablo Canyon Power Plant
Palo Verde Nuclear Generating Station
Wolf Creek Generating Station

STARS-16001

May 4, 2016

Ms. Cindy Bladey
Office of Administration, Mail Stop: OWFN-12-H08
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: STARS Alliance LLC Comments on Draft Revision 11 of NUREG-1021, *Operator Licensing Examination Standards for Power Reactors*, 81 *Fed. Reg.* 6301; Docket No. NRC-2016-0006

Reference: Letter from Nuclear Energy Institute (NEI) to Ms. Cindy Bladey, Office of Administration, "Industry Comments on Draft Revision 11 of NUREG-1021, *Operator Licensing Examination Standards for Power Reactors*, 81 *Fed. Reg.* 6301; Docket No. NRC-2016-0006," dated May 3, 2016

Dear Ms. Bladey:

STARS Alliance LLC appreciates the opportunity to comment on the proposed revision to NUREG-1021. It goes without saying that the licensed operator examination process is of great importance to our facilities and is a complex process that requires significant investment to properly administer with the required high level of integrity. For those reasons, changes to the process need to be made with great care and only of necessity. We are in agreement with the majority of the changes that are being proposed but cannot support the proposed changes to the grading of the operating examination. We do not see sufficient justification for these changes to warrant the NRC's own predictions of substantially higher failure rates. We can certainly see how the proposed changes to include greater independence in the appeal process are warranted in light of the findings by the Atomic Safety and Licensing Board (ASLB). However, it appears that these proposed changes will be eliminated with the proposed Project AIM initiative to terminate the informal appeal process. Therefore, we are not in favor of eliminating the informal appeal process and replacing it with a longer period to address exam comments.

STARS endorses the comments submitted by the Nuclear Energy Institute (NEI) in their letter written on behalf of the nuclear energy industry (the referenced letter). STARS, like NEI, agrees with the NRC's conclusion from the Operator Lessons Learned Review Team (LLRT) Report referenced in the NEI letter

that "the license operator examination process is an extremely high quality process that has been demonstrated over time to successfully evaluate and discriminate the level of competency of operator license applicants" and, we would add, with great integrity. We also agree with NEI that the proposed changes have not been limited to those needed to address the specific concerns arising from the ASLB reversal. The proposed changes to the grading of the operating exam will not, as suggested, result in greater consistency in grading of the exam but will actually result in greater subjectivity, and, therefore, variability in grading this portion of the exam.

The STARS sites are supportive of the proposal by NEI for the industry to administer the Generic Fundamentals Examinations.

If you have any questions, please contact me at 623-393-6116, or Robert.Bement@aps.com.

Sincerely,

Robert S. Bement
Senior Vice President, Site Operations, Palo Verde Nuclear Generating Station
Chairman of the STARS Site Vice President Team