

OPERATOR LICENSING OVERSIGHT PROGRAM

A. Purpose

To outline the requirements of the operator licensing oversight program to evaluate the operator licensing functions delegated to the Regional Offices.

B. Background

1. The Office of Nuclear Reactor Regulation (NRR) and the Office of New Reactors (NRO) are responsible for regulatory policy and the licensing of operators pursuant to 10 CFR Part 55. To aid in monitoring the execution of this responsibility, this Operator Licensing Manual Chapter (OLMC) outlines the program used to evaluate the operator licensing functions delegated to the Regional Offices.
2. The objectives of this manual chapter include:
 - a. Evaluating Regional consistency in implementing the regulations (Title 10 CFR Parts 50, 52 and 55), the latest version of the Operating Licensing Examination Standards for Power Reactors (NUREG-1021), and other policy directives such as approved Reports on Interactions (ROIs) or responses to Frequently Asked Questions (FAQs). Consistency is evaluated by assessing all aspects of the examination process.
 - b. Providing a structure to implement the quadrennial Regional Office Reviews (OLMC 310) and the review of initial licensing examinations (OLMC 320), to ensure consistent and thorough reviews of the Regional Offices' implementation of the delegated operator licensing functions.

C. Implementation Procedure

1. The operator licensing oversight program consists of examination reviews (two per region per year) performed in accordance with OLMC 320, a quadrennial Regional Office review performed in accordance with OLMC 310, and cross-regional examination participation (documented per Attachment 1 of this OLMC).
2. Examination Review Guidelines
 - a. By December 15 of each year, the Operator Licensing and Training Branch (IOLB) in NRR and the Human Performance, Operator Licensing and ITAAC

Branch (HOIB) in NRO (HOIB participation only is in regard to new reactor examinations) staff will determine the examination samples for the coming year. These samples will be selected based on past and current facility examination performance. IOLB will have cognizance over examination samples at existing reactor sites. HOIB will have cognizance over examination samples at new reactor sites. It is acceptable for there to be no samples for HOIB to review in any given year. Any HOIB reviews may be credited towards the minimum number of samples for a region. Cognizance over exam reviews at a given facility transitions from HOIB to IOLB once a new reactor site is no longer using a cold licensing process, as defined in the licensee facility's Final Safety Analysis Report (FSAR). Note that each program office will limit their review to exams in which there are no members of the IOLB program office serving in an examiner capacity. The following non-inclusive criteria are used to determine examination samples for review:

- A high number of post examination comments
 - A high failure rate on the immediately previous examination
 - Denied waivers/excusals/deferrals/exemptions
 - Submittal quality of the previous two examinations at the facility
 - IOLB/HOIB schedule and resources.
- b. The IOLB and HOIB supervisors have the flexibility to alter the examination samples over which they have cognizance after December 15, based on examination performance or scheduling conflicts. An example of a change in examination performance is one where an examination has a high number of failures.
- c. The Regional Operator Licensing supervisor may request selection of a different examination for review. Selection of another examination will be based on the Region's reasons for the request (i.e. already a large number of observers, resource strain, etc.) and current resource and scheduling availabilities.
- d. Although the Regional Office review occurs every four years, examination reviews will be performed for two examinations from each Regional Office each year (under extenuating circumstances, one examination review may be performed in a given year for a Regional Office). During the year of the office review, the subject Region may have more examination reviews performed.
- e. After the sample examinations for the year have been selected, the IOLB (and HOIB, if they choose to review an exam at a new reactor facility in a given year)

supervisor will assign the examination reviews to IOLB and/or HOIB staff (or a regional examiner from a different region) based on experience, expertise, and availability. If HOIB chooses to review an exam in a given year, the HOIB supervisor will communicate this to the IOLB supervisor (email is acceptable). IOLB may elect to use the HOIB review as one of the samples towards their minimum for that region.

- f. The goal for examination reviews is to have the accessible portions of the examination review completed within 30 days of examination report issuance.
- g. On-site examination reviews are preferred to in-office reviews if supported by the staff schedule and travel budget. The goal is to have at least 40% of examination reviews performed on-site, with no more than one on-site visit per region per year, with the possible exception of the region scheduled for the quadrennial Regional Office review..
- h. On-site examination reviews can be performed during examination preparation/validation, examination administration, or both. If the schedule and budget will support it, attendance at both is preferred. At least one on-site examination review will be performed during examination administration, preferably at the region that is scheduled for the Regional Office review. .
- i. Each examination review will be performed in accordance with OLMC-320. The results of the review will be informally documented for the subject Region's office review report or in a stand-alone memo. This does not preclude the reviewer from discussing his/her results with the regional branch chief upon conclusion of the review.
- j. Assessment items coded as not applicable or not evaluated shall be justified.
- k. To assist in evaluating regional consistency, the regional differences list (located at <http://fusion.nrc.gov/nrr/team/dirs/iolb/Shared%20Documents/Forms/AllItems.aspx?InitialTabId=Ribbon%2EDocument&VisibilityContext=WSSTabPersistence>) shall be reviewed prior to performing an examination review and an evaluation shall be made as to whether or not the region is properly implementing resolution to those differences. If a new regional difference is identified, IOLB staff will ensure that the regional differences list is properly updated for review and resolution. If HOIB performed the examination review, HOIB will be responsible

for informing IOLB any identified differences, and IOLB will be responsible for updating the list.

3. Regional Office Review Guidelines

- a. By December 15, the IOLB/HOIB (HOIB participation only is in regard to new reactor examinations) supervisor will determine which member of IOLB/HOIB staff will be the Team Leader for the next year's Regional Office review. As specified in OLMC-310, the Team Leader will generally be a senior examiner from IOLB, but HOIB may provide a senior examiner to lead the team. Regardless of whether the Team Leader is from IOLB or HOIB, the Regional Office review is led from IOLB. When a senior examiner from IOLB is the Team Lead, and the review is of a region with new reactors, IOLB may request that HOIB provide an examiner (or, HOIB may elect to provide an examiner) as part of the review team.
- b. The Team Leader will ensure that the office review is performed in accordance with OLMC- 310.
- c. The Team Leader will review the subject Regional Offices' self-assessments (if applicable) performed since the last Regional Office review. The Team Leader will also review the most recent in-office review results for both the subject region and the other regions to look for trends and recent performance.
- d. The review is intended to ensure consistent application of the Examination Standard. There is no prohibition on the number of positive or negative observations. There shall be an adequate basis for each observation.
- e. The Team Leader will briefly review a sample (a minimum of 20% or 10, whichever is greater) of the subject Region's examination reports issued since the last review. Questions or concerns found during this review shall be followed up on with the Region under review.
- f. Assessment items coded as not applicable or not evaluated shall be justified.
- g. The Regional Office review may include the previous examination audit results performed per OLMC 320 since the last review which are not already documented in a stand-alone memo. Additional examination paperwork shall be reviewed as necessary to ensure that the team gets a representative sampling of

the Regional Office's implementation of the operator licensing process.

- h. Team members shall review the amount and effectiveness of Regional Office cross-regional examination participation, including how the region shares best practices or inconsistencies with headquarters staff and the other Regional Offices. Attachment 1 provides the method by which the Regional Offices can document their participation in cross-regional examination activities. Specific instructions for this review are contained in OLMC-310.
4. Cross-Regional Examination Participation Guidelines
- a. Each Regional Office will support another Regional Office examination once per year. Each Regional Office can support additional examinations in other regions as resources allow.
 - b. Regional Offices can provide examination support to any other Regional Office, but it is preferred that the Regional Offices rotate support to other Regional Offices from year-to-year to allow for best exposure to different regional practices.
 - c. By December 15 of the current year, the Regional Office operations branch chief will determine which cross-regional examinations will be performed for the following year and will select the examiner who will participate in the examination.
 - d. The Regional Office operations branch chief has the flexibility to alter the examination or examiner chosen if necessary. If the branch chief has to change examiners or the examination chosen, he/she will notify the affected Regional Office as soon as possible so that they can replace the examiner as required.
 - e. Any examiner participating in a cross-regional examination will ensure that all necessary documentation for the site visit is completed in a timely fashion.
 - f. Any examiner participating in a cross-regional examination will participate in both the validation and administration weeks of the examination. In the event that a conflict arises regarding the ability to participate in validation week, the Chief Examiner and the applicable operations branch chiefs will determine if the cross-regional examiner can still participate in the administration weeks.

- g. The examiner will timely document the examination results of his/her initial license applicants and provide these results to the Chief Examiner, as well as any input into the Examination Report. The time by which exam results and documentation must be given to the Chief Examiner will be worked out with the Chief Examiner such that the Chief Examiner will be able to meet timeliness requirements of NUREG 1021.
- h. Following issuance of the Examination Report, the regional examiner will fill out a feedback form/memo (See Attachment 1) documenting the results of the cross-regional examination experience and provide copies to both the affected Regional Office operations branch chief as well as the IOLB chief. The HOIB branch chief may also be provided a copy of the feedback form, particularly if the exam in question was a new reactors exam.
- i. The examiner and Regional Offices will ensure that any newly identified regional differences, in addition to any recommended resolutions (if applicable), are provided to IOLB for inclusion in the regional differences file for review and resolution. Regional differences noted on new reactors exams will also be maintained in the IOLB regional differences file.
- j. The examiner may review the regional differences file prior to examination validation and administration for review, if desired.

ATTACHMENT 1

Operator Licensing Regional Differences Debrief Form

The objective of this debrief is to illuminate the best practices employed nationwide in the Operator Licensing process with the ultimate goal of improving this process. The purpose of this form is to document observed regional differences among a variety of topics. For each item, identify whether:

- (1) The item is performed the same as your home Region
- (2) The item is performed differently than your home Region, but the alternate approach appears to meet the requirements of NUREG-1021
- (3) The item is performed differently than your home Region, and the alternate approach does not appear to meet the requirements of NUREG-1021

Additional space is provided in the event a difference is noted that is not on this list, or if you wish to provide amplifying information (including if the observed difference may constitute a “best practice”).

1. Simulator Exam Administration

Were there any differences between your home Region and the host Region with respect to:

- | | | | |
|---------------------------------|--|--|--|
| (a) Use of surrogates | (1) <input type="checkbox"/> (2) <input type="checkbox"/> (3) <input type="checkbox"/> | (g) TS call methodology | (1) <input type="checkbox"/> (2) <input type="checkbox"/> (3) <input type="checkbox"/> |
| (b) Scenario length | (1) <input type="checkbox"/> (2) <input type="checkbox"/> (3) <input type="checkbox"/> | (h) Deviations from script | (1) <input type="checkbox"/> (2) <input type="checkbox"/> (3) <input type="checkbox"/> |
| (c) Number of scenario events | (1) <input type="checkbox"/> (2) <input type="checkbox"/> (3) <input type="checkbox"/> | (i) Applicant de-brief's | (1) <input type="checkbox"/> (2) <input type="checkbox"/> (3) <input type="checkbox"/> |
| (d) Scenario difficulty | (1) <input type="checkbox"/> (2) <input type="checkbox"/> (3) <input type="checkbox"/> | (j) Examiner caucus following scenario | |
| (e) Use of critical tasks | (1) <input type="checkbox"/> (2) <input type="checkbox"/> (3) <input type="checkbox"/> | (k) Scenario grading practices | (1) <input type="checkbox"/> (2) <input type="checkbox"/> (3) <input type="checkbox"/> |
| (f) Use of plant status brief's | (1) <input type="checkbox"/> (2) <input type="checkbox"/> (3) <input type="checkbox"/> | | |

Explain any identified differences that could result in an overall process improvement:

