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Knowledge and Abilities Catalog for Nuclear Power Operators: Pressurized Water Reactors and Boiling Water Reactors

**Comment On:** NRC-2017-0068-0001

Knowledge and Abilities Catalog for Nuclear Power Plant Operators: Pressurized Water Reactors; Knowledge and Abilities Catalog for Nuclear Power Plant Operators: Boiling Water Reactors; Request for Comment on Draft NUREGs

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## General Comment

In the event there is a comment associated with "tagging" K/A statements, to direct the K/A statement to one or the other exam settings (written, walkthrough, operating, etc.), or to direct the writer to provide a reference to the applicant, then this comment applies.

It is not appropriate to designate any of the following K/A statements towards the operating exam, for the reasons provided.

Generic K/As for Tier 1 and Tier 1, listed on page 4 of 52 in NUREG-1021 Rev. 11. These K/A statements are used to overlay onto a Tier 1 or Tier 2 topic; limiting the setting for these K/As is inappropriate.

Moreover, the following K/A statements are appropriate to test in BOTH written and operating exam settings: G2.1.5, G2.2.1, G2.2.2, G2.2.15, G2.2.23, G2.3.5, G2.3.11.

Notwithstanding any comment to the contrary, ES-401 already provides a process to exam writers for K/A statements that are not conducive, or difficult to address, on the written exam. Additionally, there is already guidance to exam writers for closed book exams where a reference may or may not be needed.

Providing "guidance" to exam writers, in the K/A catalog is not appropriate. If additional "guidance" is needed, then revise NUREG 1021.

In the event there is a comment associated with "tagging" K/A statements, this approach will muddy the waters between Chief Examiners and Licensee Exam Writers.

GOVT Review Complete  
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Call = D. Miller (dsmm3)