

Vogle PEmails

From: Hoellman, Jordan
Sent: Wednesday, February 13, 2019 4:06 PM
To: Roberts, Kelli Anne (KROBERTS@southernco.com); Leighty, Steven
Cc: Patel, Chandu; Dixon-Herrity, Jennifer; Vogtle PEmails
Subject: RAI Transmittal for Vogtle Units 3 and 4, Request for Exemption from Operator Written Examination and Operating Test
Attachments: Final RAI - Exemption from Operator Written Examination and Operating Test.pdf

Good Afternoon,

By letter dated December 20, 2018, Southern Nuclear Operating Company (SNC) submitted Request for Exemption from Operator Written Examination and Operating Test to the U.S. Nuclear Regulatory Commission (NRC) for Vogtle Electric Generating Plant Unit 3 (VEGP 3) (Agencywide Documents Access and Management System Accession No. ML19030A226). The NRC staff is reviewing the request to enable the staff to reach a conclusion on the safety of the proposed changes.

The NRC staff has identified that additional information is needed to continue the review. The staff's request for additional information (RAI) is contained in the attachment to this email.

To support the review schedule, you are requested to respond within 30 days of the date of this email. If changes are needed to the final safety analysis report, the staff requests that the RAI response include the proposed wording changes.

If you have any questions or comments concerning this matter, please contact me at 301-415-5481.

Sincerely,

Jordan Hoellman
Project Manager
NRO / DLSE / LB2
U.S. Nuclear Regulatory Commission
office: OWFN-08-C18
phone: (301) 415-5481
email: Jordan.Hoellman2@nrc.gov

Hearing Identifier: Vogtle_COL_Docs_Public
Email Number: 419

Mail Envelope Properties (MN2PR09MB3390D5E1FB58546DCBB5C9EDD5660)

Subject: RAI Transmittal for Vogtle Units 3 and 4, Request for Exemption from Operator Written Examination and Operating Test
Sent Date: 2/13/2019 4:05:44 PM
Received Date: 2/13/2019 4:05:50 PM
From: Hoellman, Jordan

Created By: Jordan.Hoellman2@nrc.gov

Recipients:

"Patel, Chandu" <Chandu.Patel@nrc.gov>
Tracking Status: None
"Dixon-Herrity, Jennifer" <Jennifer.Dixon-Herrity@nrc.gov>
Tracking Status: None
"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>
Tracking Status: None
"Roberts, Kelli Anne (KROBERTS@southernco.com)" <KROBERTS@southernco.com>
Tracking Status: None
"Leighty, Steven" <sleighty@southernco.COM>
Tracking Status: None

Post Office: MN2PR09MB3390.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	1292	2/13/2019 4:05:50 PM
Final RAI - Exemption from Operator Written Examination and Operating Test.pdf		
99331		

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

Request for Additional Information – FINAL

Request for Exemption from Operator Written Examination and Operating Test

Issue Date: February 13, 2018
Application Title: VEGP, Units 3 and 4 – Exemption Request
Operating Company: Southern Nuclear Operating Co.
Docket No. 52-0025 and 52-0026

By letter dated December 20, 2018, Southern Nuclear Operating Company, Inc. (SNC), submitted "Request for Exemption from Operator Written Examination and Operating Test" to the U.S. Nuclear Regulatory Commission (NRC) for Vogtle Electric Generating Plant Unit 3 (VEGP 3) (Agencywide Documents Access and Management System Accession No. ML19030A226). Specifically, SNC requested, on behalf of 12 former operator license candidates from Virgil C. Summer Nuclear Station Unit 2 (VCSNS 2) who are identified in Enclosure 2 of the letter dated December 20, 2018, and who are now employed by SNC at VEGP 3, exemptions from the requirements of title 10 of the *Code of Federal Regulations* (10 CFR) 55.31(a)(3) and 10 CFR 55.33(a)(2).

In accordance with 10 CFR 55.11, the Commission may, upon application by an interested person, or upon its own initiative, grant such exemptions from the requirements of the regulations in this part as it determines are authorized by law and will not endanger life or property and are otherwise in the public interest. Section 10 CFR 55.31(a)(3) requires each applicant for an operators' license to submit a written request from an authorized representative of the facility licensee by which the applicant will be employed that the written examination and operating test be administered to the applicant. Section 10 CFR 55.33(a)(2) states in part that the Commission will approve an initial application for a license if it finds that the applicant has passed the requisite written examination and operating test in accordance with 10 CFR 55.41 and 55.45 or 55.43 and 55.45. It also states in part that the written examinations and operating tests determine whether the applicant for an operator's license has learned to operate a facility competently and safely, and additionally, in the case of a senior operator, whether the applicant has learned to direct the licensed activities of licensed operators competently and safely.

Enclosure 1 of the letter dated December 20, 2018, states that the 12 former VCSNS 2 operator license candidates previously passed a written examination and operating test for VCSNS 2. Enclosure 1 also summarizes the results of a gap analysis SNC conducted to identify potential differences in the written examinations and operating tests given at VCSNS 2 and VEGP 3. The results of the gap analysis showed that there were differences in the emergency plan implementing procedures and conduct of operations procedures for each site.

The knowledge and abilities that are necessary to safely and competently implement the emergency plan and conduct of operations procedures at a site are tested on the written examination and on the operating test (i.e., by administrative job performance measures). Because the emergency plan implementing procedures and conduct of operations procedures at VCSNS 2 were different than those at VEGP 3, it is possible that the exams given to the 12 individuals at VCSNS 2 tested information about these two topics that is not applicable to VEGP 3. Therefore, the NRC staff cannot rely on those portions of the written exams and

operating tests that tested knowledge and abilities associated with implementing the VCSNS 2 emergency plan and conduct of operations procedures to determine whether the 12 individuals have learned to implement the emergency plan and conduct of operations procedures competently and safely at VEGP 3.

Enclosure 1 states that SNC trained the 12 individuals on the VEGP 3 emergency plan implementing procedures and conduct of operations procedures. It also states that each of the 12 individuals passed exams that were developed by SNC on the VEGP 3 emergency plan implementing procedures and conduct of operations procedures.

QUESTIONS

1. The staff requests the following additional information to determine whether the exams that SNC administered to the 12 former VCSNS 2 operator license candidates adequately demonstrate that they have learned to implement the VEGP 3 emergency plan and conduct of operations procedures:
 - a. The minimum score needed to pass the exam,
 - b. Whether and how these exams tested knowledge and abilities necessary to implement the VEGP 3 emergency plan and conduct of operations procedures that otherwise would be tested on an NRC written exam and operating test,
 - c. Whether and how exam security measures were established for these exams.
2. Additionally, Enclosure 1 states that SNC conducted the gap analysis by comparing "VEGP and VCSNS tasks lists."

Please clarify whether task lists for both reactor operators and senior reactor operators were reviewed during the gap analysis.