

## Vogle PEmails

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**From:** Hoellman, Jordan  
**Sent:** Tuesday, February 19, 2019 8:12 AM  
**To:** Vogle PEmails  
**Subject:** Draft RAI Response Related to Vogle Units 3 and 4, Request for Exemption from Operator Written Examination and Operating Test  
**Attachments:** Operator Exam Exemption Request- SNC Draft RAI Responses.pdf

Forwarding to ADAMS for discussion at a future public meeting.

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**From:** Roberts, Kelli Anne [mailto:KROBERTS@southernco.com]  
**Sent:** Monday, February 11, 2019 3:56 PM  
**To:** Hoellman, Jordan <Jordan.Hoellman2@nrc.gov>; Leighty, Steven <sleighty@southernco.COM>  
**Cc:** Patel, Chandu <Chandu.Patel@nrc.gov>  
**Subject:** [External\_Sender] RE: Draft RAI Related to Vogle Units 3 and 4, Request for Exemption from Operator Written Examination and Operating Test

Jordan,

I've attached our draft responses to the RAI. If staff doesn't have any questions on our draft responses, I don't think we need a clarification call and the questions can be issued as final. If they do have questions on our draft responses, we would like a clarification call.

Thanks,

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**Kelli Roberts | Southern Nuclear Operating Company**  
Vogle 3&4 Licensing Manager (Acting)

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**From:** Hoellman, Jordan <Jordan.Hoellman2@nrc.gov>  
**Sent:** Monday, February 11, 2019 11:39 AM  
**To:** Roberts, Kelli Anne <KROBERTS@southernco.com>; Leighty, Steven <sleighty@southernco.COM>  
**Cc:** Patel, Chandu <Chandu.Patel@nrc.gov>  
**Subject:** FW: Draft RAI Related to Vogle Units 3 and 4, Request for Exemption from Operator Written Examination and Operating Test

**EXTERNAL MAIL: Caution Opening Links or Files**

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Kelli or Steve,

Do you want to schedule a clarification call to discuss these questions or can they be issued as final?

Thanks,  
Jordan

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**From:** Hoellman, Jordan

**Sent:** Thursday, January 31, 2019 3:42 PM

**To:** Roberts, Kelli Anne ([KROBERTS@southernco.com](mailto:KROBERTS@southernco.com)) <[KROBERTS@southernco.com](mailto:KROBERTS@southernco.com)>

**Cc:** Patel, Chandu <[Chandu.Patel@nrc.gov](mailto:Chandu.Patel@nrc.gov)>; Nist, Lauren <[lauren.nist@nrc.gov](mailto:lauren.nist@nrc.gov)>; Vogtle PEmails <[Vogtle.PEmails@nrc.gov](mailto:Vogtle.PEmails@nrc.gov)>

**Subject:** Draft RAI Related to Vogtle Units 3 and 4, Request for Exemption from Operator Written Examination and Operating Test

Good Afternoon,

Attached is a draft Request for Additional Information (RAI) related to Vogtle Units 3 and 4, Request for Exemption from Operator Written Examination and Operating Test.

If you would like to schedule a clarification conference call to discuss this RAI, please let me know by Friday, February 8, 2019. If no request for a clarification call is received, this RAI will be issued as final.

Please let me know if you have any questions.

Thank you,

Jordan

**Jordan Hoellman**

*Project Manager*

*Licensing Branch 2*

*Division of Licensing, Siting, and Environmental Analysis*

*Office of New Reactors*

*U.S. Nuclear Regulatory Commission*

*office: OWFN 08-C18*

*phone: (301) 415-5481*

*email: [Jordan.Hoellman2@nrc.gov](mailto:Jordan.Hoellman2@nrc.gov)*

**Hearing Identifier:** Vogtle\_COL\_Docs\_Public  
**Email Number:** 420

**Mail Envelope Properties** (MN2PR09MB339041D863ADB51331C0138ED57C0)

**Subject:** Draft RAI Response Related to Vogtle Units 3 and 4, Request for Exemption  
from Operator Written Examination and Operating Test  
**Sent Date:** 2/19/2019 8:11:46 AM  
**Received Date:** 2/19/2019 8:11:51 AM  
**From:** Hoellman, Jordan

**Created By:** Jordan.Hoellman2@nrc.gov

**Recipients:**  
"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>  
Tracking Status: None

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

Files	Size	Date & Time	
MESSAGE	3067	2/19/2019 8:11:51 AM	
Operator Exam Exemption Request- SNC Draft RAI Responses.pdf			645842

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

### **RAI Question 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.

### **SNC Response to RAI Question 1**

1.a. The minimum passing score for examinations related to the emergency plan and the conduct of operations procedures was 80%. The minimum score needed to pass the exams was based on criteria used for the Initial License Training (ILT) Program; NMP-TR-417, "Initial License Training Program," outlines passing criteria for operator exams.

1.b. All questions and JPMs were based on and linked to knowledge and ability (k/a) items selected from NUREG 2103. The importance rating of each k/a item was equal to or greater than 2.5. The test questions were developed by an instructor with experience writing regulatory exam questions.

As stated in the exemption request, subjects included in operations procedure training were those which provided operators with VEGP's expectations for operators in conduct of operations for plant control, configuration management, and administration of duties. In addition, the training on the emergency plan was delivered to the candidates using the same material presented to the VEGP Unit 3 initial licensed operator candidates in their post-NRC examination transition training.

1.c. The exams were developed and administered in accordance with SNC policies used for licensed operator exams; NMP-TR-417, "Initial License Training Program," was followed. Exam security was in place for gap training; exam security was established in accordance with NMP-TR-208, "Examination and Examination Security."

### **RAI Question 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.

### **SNC Response to RAI Question 2**

The task list review, conducted as part of the gap analysis, included a comparison of both the Reactor Operator and Senior Reactor Operator task lists. The review was conducted in accordance with NISP-TR-01, "Systematic Approach to Training Process."