

Southern Nuclear Operating Company

ND-19-0289

Enclosure 1

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Revised Response to Request for Additional Information Question 1b Related to
Request for Exemption from Operator Written Examination and Operating Test**

(This enclosure consists of 3 pages, including this cover page)

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The following question was provided by the NRC Staff on February 13, 2019 (ADAMS Accession Number ML19044A780) regarding the review of Southern Nuclear Operating Company, Inc. (SNC) submitted letter ND-18-1126, *Request for Exemption from Operator Written Examination and Operating Test*, for Vogtle Electric Generating Plant Units 3 and 4 (ADAMS Accession No. ML19030A226). The revised response to Question 1b is provided below.

RAI Question 1b

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:

- 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,

SNC Response to RAI Question 1b

1.b. The exams that SNC administered to the 12 former VCSNS Unit 2 operator license applicants on the VEGP Unit 3 emergency plan implementing procedures (EPIP) and the conduct of operations procedures, immediately following the gap training, included both JPMs and written test questions. The exams consisted of a 25-question written exam and a 5-part JPM exam. The test questions were developed by an instructor who is both trained and experienced in writing regulatory exam questions. The written exam questions met the standards in NUREG 1021, Appendix B, and the JPM questions met the standards in NUREG 1021, Appendix C.

The written exam tested the candidates on conduct of operations procedures. The nature of the gap for Conduct of Operations, identified during the gap analysis, was knowledge based, not skill based, so the method selected to evaluate the gap closure was a written exam. The JPMs tested the candidates on the EPIP; the JPMs were administrative in nature based on the gap being addressed. There was no overlap between the written and initial JPM exams.

All written test 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 exams were based on closing the gaps which were identified during the Systematic Approach to Training based gap analysis. The K/As selected for the exams that SNC administered sampled from all the K/As that SNC identified as testable differences. K/As from the following sections of NUREG 2103 were sampled:

- 2.1 Conduct of operations,
- 2.2 Equipment Control,
- 2.3 Radiation Control, and
- 2.4 Emergency Procedures and Emergency Plan

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

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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.

Subsequently, five additional JPMs were administered to eleven of the applicants listed in the exemption request (one candidate has subsequently left the company). The supplementary JPMs tested the candidates' knowledge of the conduct of operations procedures. These JPM questions were linked to K/As, from Sections 2.1, 2.2, and 2.3 of NUREG 2103, having an importance rating of 2.5 or higher. The questions met the standards in NUREG 1021, Appendix C and were written and administered by trained and experienced instructors. The scores of the supplementary JPMs were combined with the scores of the initial JPMs to provide an overall grade for the JPM exam.

All candidates successfully completed both the written and JPM exams discussed above.