Conducting Initial License Examinations during COVID19

Initial License Examinations

The regulations contained within 10 CFR Part 55 specifically incorporate NUREG-1021 by reference and direct that initial operator license written examinations and operating tests be developed, administered, and graded in accordance with NUREG-1021.

Written Examinations

NRR/DRO/IOLB permission is being given, as requested on a case by case basis, to administer the written examination without delay and to exceed the NUREG-1021 maximum 30-day requirement between written exam and operating test. (NRC is not present for written exam administration).

Operating Test Scheduling Considerations

1. Operator Licensing (OL) exams, which play a part in fulfilling a mission critical function of having sufficient licensed operators to support safe operations, should have schedules that will help enable that function.
2. Regions should begin scheduling exams, coordinated with power reactor licensees, to resume examinations, with flexibility to take into account health and safety of plant staff (including licensed operators and applicants) and NRC staff. This will be done considering the status of national, state and local Covid 19 conditions and guidance for mission critical work. Consideration should also be given to alleviate the concern that a backlog of initial license exams could impact licensee scheduling of exams in the fall outage season.
3. Travel for exam activities has been authorized for May if needed to support this objective

Operating Test Compensatory Measures

The following compensatory measures should be considered to reduce personnel risk for conducting operator license examinations during the COVID 19 Public Health Emergency:

1. Regional management should ensure that acceptable travel options, lodging and food are expected to be available to examiners while on travel for examination activities.
2. Examination teams should comply with national, state, and local restrictions for mission critical work.
3. Minimize activities conducted onsite, in person (conduct meetings, briefings remotely as possible)
4. Consider daily health screening of applicants, licensee personnel and examiners (temperature check, symptom questionnaire), in coordination with licensee practices for minimizing COVID 19 infections.
5. Identifying locations within simulator for examiners to observe effectively with minimal interaction with applicants and training staff
6. Provisions for public health PPE for examiners, licensee staff, and applicants; along with an assessment of use of masks/gloves on applicant performance (barrier to communications, fogged eyeglasses, etc.).
7. Coordinate with licensee for simulator, high traffic areas, and NRC examination team rooms to be cleaned/disinfected regularly.

8. Take precautions to minimize the potential spread of virus due to exchanges of paperwork during the exam. Considerations should include ways to minimize potential spread of virus from exam paperwork, while maintaining exam security requirements. Paperwork could be isolated for a period of time, cleaned, or digitized before changing possession, for example.

9. Consider site specific contingencies where available – use of electronic tablets, binoculars, lapel microphones, headsets, etc.

10. Consider use of separate examiner crews, in separate rooms, especially if two simulators are available.

11. If possible, limit crew size for validation and limit examiners conducting in-plant JPM validation.

12. Regions should act in the best health interest of licensee and NRC staff in the event an applicant, licensee employee or examiner exhibits COVID19 symptoms during exam validation or administration. NRC will consider licensee practices along with NRC policies and guidance for determining response and exam path forward in these cases.