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# **Exemption from Operator Written Examination and Operating Test for Unit 4 Licenses**

**June 24, 2020**

# Background

- **Vogtle Electric Generating Plant (VEGP) has currently licensed operators for VEGP Unit 3, which need to be licensed to operate the nearly identical Unit 4.**
- **These operators have already successfully passed a written exam and operating test on an AP1000 standard plant. Any further testing would be duplicative in nature, and a waste of licensee and NRC resources.**



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# Applicable Regulations

- **§ 55.33 Disposition of an initial application.**

*(a)(2) Written examination and operating test.* The applicant has passed the requisite written examination and operating test in accordance with §§ 55.41 and 55.45 or 55.43 and 55.45. These examinations and 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.

- **§ 55.31 How to apply.**

*(a)(3)* 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;



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# Basis for Exemption

- **VEGP 3&4 are AP1000 Standard plants that are essentially identical.**
  1. An Engineering Evaluation determined that only minor differences exist between units, and that the units are nearly functionally identical.
  2. A Training Needs Analysis (TNA) on the differences was completed. The TNA determined that no additional training is required: therefore, no new or modified exam questions, operating scenarios, or job performance measures are needed. Also, the TNA determined that the differences between the units do not affect the operator's ability to operate each unit safely and competently.



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# Basis for Exemption

- **Unit 3 licensed operators have already been tested on a written and operating test which also would be applicable to Unit 4.**
- **In addition, upon successfully completing their Unit 3 written examination and operating test, the Unit 4 operator candidates have been enrolled in a Systematic Approach to Training (SAT)-based continuing training program that is applicable to both Unit 3 and Unit 4.**



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# Conclusion

- **SNC is requesting an exemption from 10 CFR 55.33(a)(2) and 10 CFR 55.31(a)(3)**
- **Vogtle Unit 4 Operator Licensing candidates have already passed a written exam and operating test on nearly identical Vogtle Unit 3**
- **Engineering evaluation and Training Needs Analysis determined no impact on Operator training between the Units**



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