

Operator Licensing

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Objectives

- Overview of the Examination Lifecycle
 - Rundown of examination process from start to finish
- Components of an Ideal Application
 - What items to include and avoiding common pitfalls during the application process
- Electronic Submission Methods
 - Available submission options and how to decide which option is ideal
- Examination Advancements
- Operator Licensing and Facility Challenges
 - Collaborating to address various challenges
- Updates to Guidance Documents

Examination Lifecycle

Request for Examination Data - May



Schedule and Confirmation - 90 days prior



Examination Preparation - 90 - 14 days prior



Post-Exam Actions – Up to 60 days after

Request for Examination Data

Before Upcoming Fiscal Year – Typically May

- NPUF Response Email should provide:
 - 1st week, alternate 2nd week
 - Number and type of Applicants (RO/SRO-Instant, SRO-Upgrade, Retake Candidates)
 - No exam requested
 - ≥ 10 applicants needs 2 Chief Examiners
- Exam schedule is set on a first come, first scheduled basis
 - Few adjustments are accommodated after schedule is set
- Unforeseen circumstances that impact schedule (i.e. govt. shutdown, reactor issues)



Schedule and Confirmation

Appox. 90 Days Prior to Requested Week

- Chief Examiner and facility confirm the week of examination
- Confirmation letter sent
- Facility provides access to pertinent documents, including but not limited to:
 - Technical Specifications
 - Safety Analysis Report
 - Emergency Procedures
 - Security Procedures
 - Administrative and Operations Procedures
 - Training documents



Examination Preparation

90-14 Days Prior to Examination

- Chief Examiner Activities
 - Prepare examination using the submitted facility documents
 - Review submitted applications, work with facility for any needed changes
 - Sign applications
- Administrative Activities
 - Enter completed applications into RPS-OL database
 - Submit medical documentation for NRC Medical Review Officer (MRO) review (if applicable)
 - Create and distribute any applicable waiver/excusal/deferral letters

Post-Exam Actions

30-60 Days After Resolution of Facility Exam Comments

Examination Processing

- CE Grade Individual's Results and Peer Review
- Record Examination Results and Update Individual Operator Docket Files

Delivery of Exam Results

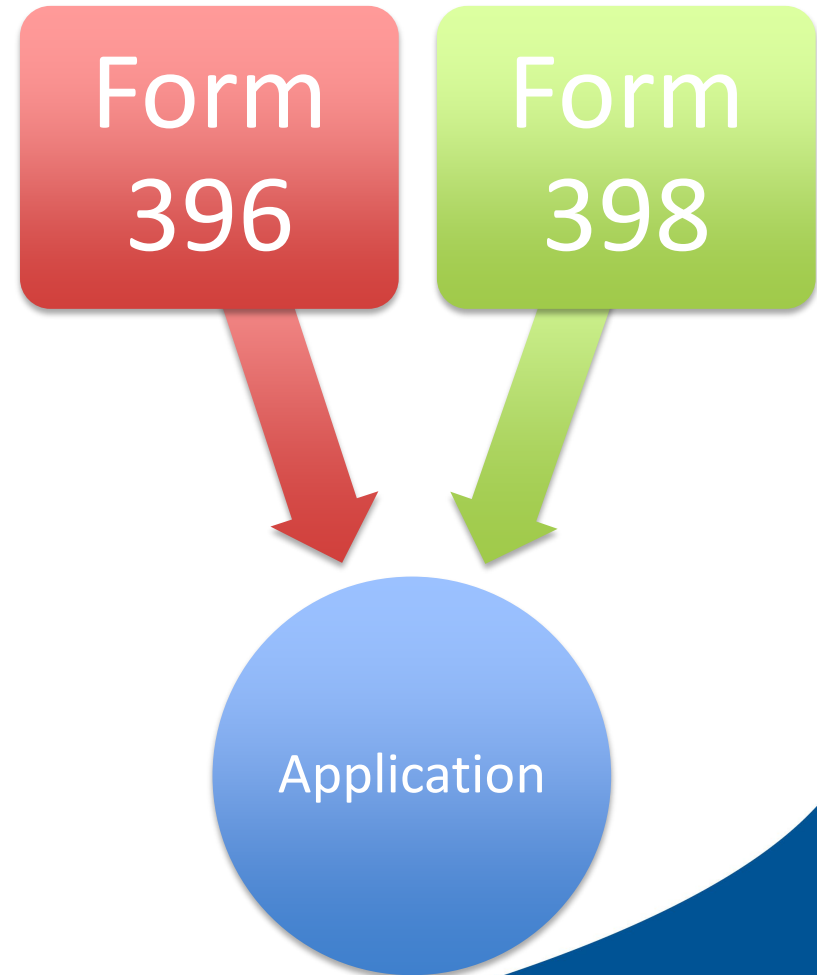
- Initial Results
- Preliminary and Final Denial Letters
- Pass Letters for License Deferrals

Certificates (12-18 weeks post exam results)

- Certificates are **ONLY** document with **WET** signature

Components of an Ideal Application

- Application submitted timely
 - 14 days prior to exam, sooner if application needs further review (i.e. medical)
- Application complete and accurate
 - Use most recent NRC Form 396 **and** 398 (available on website)
 - Forms must have ALL applicable sections filled in completely and include all additional info needed for accurate review.
- Application submittal - use an NRC Approved Method



Formal Electronic Submittals

- NRC's Goal: To ensure that all documents delivered to us electronically are accurately depicted as the submitter intended.
- How does the Electronic Information Exchange (EIE) achieve this??
 - Receive
 - Read
 - Authenticate
 - Distribute
 - Archive

Fast Facts About the EIE

- TWO Platforms: General and Part 55
- The Part 55 EIE is currently the only platform to **formally** submit OL application forms and any supplemental documentation
- Anyone who sends or receives documents from the EIE needs a digital certificate (including operators)
- To use the EIE effectively, each certificate needs two things
 - Unique Computer
 - Unique Email Address

Supplemental Options for Electronic Submittals

- Other Delivery Methods Available
 - General Submission EIE
 - SharePoint External Sharing (SPxS)
 - Encrypted Delivery via Email

How Do I Choose??



Things to Consider for Electronic Submissions

- Does my submission need to be tracked and archived to be in compliance with regulatory requirements?
- Does it contain information specific to an ***operator*** or the ***facility***?
- Does it contain any PII or sensitive materials?



How Do I Choose?

Part 55 EIE

- Form 398
- Form 396
- Requests for various operator licensing (OL) actions
 - OL Amendments
 - OL Renewals
 - OL Terminations
- Supporting Documentation for any of these requests.

Sharepoint External Sharing

- Facility documents needed to support examination preparation (Enclosure 1 on your Exam Confirmation Letter)
- Courtesy copies of communications already sent via EIE (non SGI)

General Submission EIE

- Documents impacting a facility's operating License
 - Facility License Amendment Requests
 - Annual Reports
 - Updates to Tech Specs
 - Facility Exemption Requests*

Encrypted Email

- Informal Communications containing information you wish to encrypt for other reasons.
- Formal Communications only when standard submittal methods have failed (subject to approval before submission)

Operator Licensing Challenges

- FY exam requests
- Scheduling and examination arrangements
- Facility documentation to support examination
- Application Submissions
- License Renewals

Examination Advancements

- Technology
- Programs – Collaborative Learning Environment (CLE)
- Retakes
 - Expedited results
 - Remote implementation
 - Demonstrate retraining to support reapplication

Facility Challenges

- Facility Technical Specifications
 - limits and requirements
- 10 CFR 55.11, Specific exemptions
 - operator license status
- 10 CFR 55.59, Requalification
 - 55.59(b), Additional Training with Commission approval

Guidance Documents Updates

- EO 14300 incorporated changes
 - NUREG-1478, Revision 3
- ANSI 15.4, Initial and renewal licensing
- ANSI 15.23, Medical Certification and Monitoring of Personnel Requiring Operator Licenses for Research and Test Reactors
- Future possibilities

Key Takeaways

- Timeliness is one of the most impactful ways to ensure successful outcomes in OL Activities
- Engage early, engage often
 - Embrace the unique relationship between the NRC and NPUFs to communicate any challenges or concerns that may impact your facility.

Links to Previous Trainings and NRC Application Forms

- NRC Form 398 and 396 training
 - <https://www.nrc.gov/docs/ML2410/ML24102A017.pdf>
 - <https://www.nrc.gov/docs/ML2410/ML24102A016.pdf>
- Current Forms
 - NRC Form 398
<https://www.nrc.gov/docs/ML1308/ML13083A127.pdf>
 - NRC Form 396
<https://www.nrc.gov/docs/ML1308/ML13083A123.pdf>

Important Links/Information

- EIE
 - [EIE - General Submission Platform](#)
- EIE Part 55
 - [EIE - Part 55 Platform](#)
- EIE User Guide
 - [EIE User Guide PDF](#)



Questions?