




## Proposed Changes to the NRC's Operator Licensing Program

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## Background

- November 2014 – A Lessons Learned Review Team (LLRT) delivered 23 recommended changes to the operator licensing program with the goal of strengthening the program.

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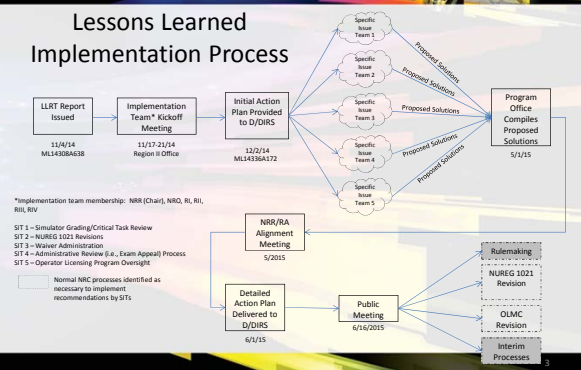
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## Lessons Learned Implementation Process



LLRT Report Issued: 11/4/14, ML142084638  
 Implementation Team\* Kickoff Meeting: 11/17-21/14, Region II Office  
 Initial Action Plan Provided to O/DIRS: 12/2/14, ML14336A172  
 Program Office Complexes Proposed Solutions: 5/1/15  
 NRR/RA Alignment Meeting: 5/2015  
 Public Meeting: 4/16/2015  
 Detailed Action Plan Delivered to O/DIRS: 6/1/15  
 Rulemaking: NUREG 1021 Revision  
 OLMC Revision  
 Interim Processes

\*Implementation team membership: NRR (Chair), NRC, RI, HI, RII, BIV  
 SIT 1 – Simulator Grading/Critical Task Review  
 SIT 2 – NUREG 1021 Revisions  
 SIT 3 – Waiver Administration  
 SIT 4 – Administrative Review (i.e., Exam Appeal) Process  
 SIT 5 – Operator Licensing Program Oversight  
 Normal NRC processes identified as necessary to implement recommendations by SITs.

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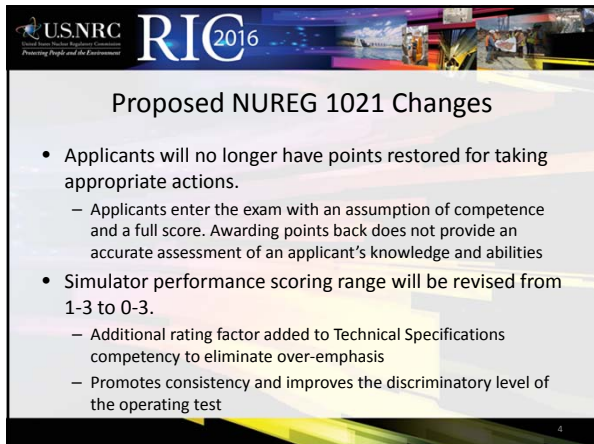
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**Proposed NUREG 1021 Changes**

- Applicants will no longer have points restored for taking appropriate actions.
  - Applicants enter the exam with an assumption of competence and a full score. Awarding points back does not provide an accurate assessment of an applicant's knowledge and abilities
- Simulator performance scoring range will be revised from 1-3 to 0-3.
  - Additional rating factor added to Technical Specifications competency to eliminate over-emphasis
  - Promotes consistency and improves the discriminatory level of the operating test

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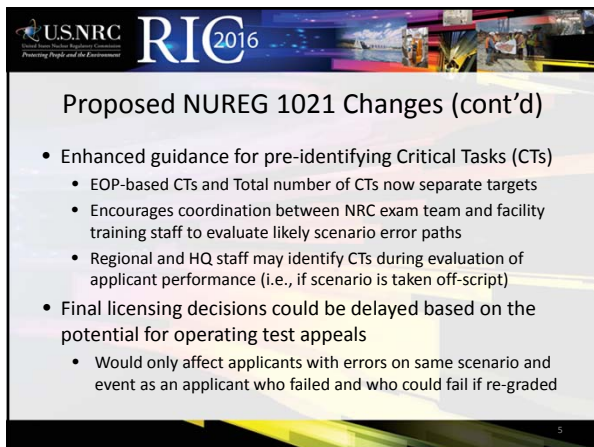
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**Proposed NUREG 1021 Changes (cont'd)**

- Enhanced guidance for pre-identifying Critical Tasks (CTs)
  - EOP-based CTs and Total number of CTs now separate targets
  - Encourages coordination between NRC exam team and facility training staff to evaluate likely scenario error paths
  - Regional and HQ staff may identify CTs during evaluation of applicant performance (i.e., if scenario is taken off-script)
- Final licensing decisions could be delayed based on the potential for operating test appeals
  - Would only affect applicants with errors on same scenario and event as an applicant who failed and who could fail if re-graded

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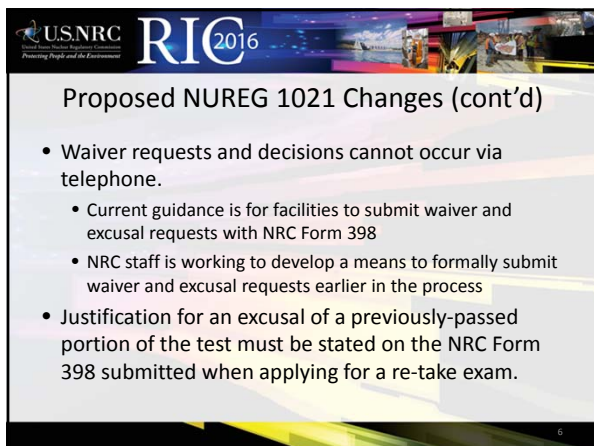
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**Proposed NUREG 1021 Changes (cont'd)**

- Waiver requests and decisions cannot occur via telephone.
  - Current guidance is for facilities to submit waiver and excusal requests with NRC Form 398
  - NRC staff is working to develop a means to formally submit waiver and excusal requests earlier in the process
- Justification for an excusal of a previously-passed portion of the test must be stated on the NRC Form 398 submitted when applying for a re-take exam.

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### Proposed NUREG 1021 Changes (cont'd)

- Any re-examination following an allegation of conflicts of interest or bias shall be observed by a Branch Chief or other management official
  - Observer will not be from the same region as the exam team
  - Objective is to protect the applicant and the examiner equally
- Incorporating all applicable FAQs into NUREG 1021
  - FAQ process will still be available to answer any new questions
- Other minor changes have been proposed that are unrelated to the lessons learned activity
  - Previous unresolved issues
  - Housekeeping
  - Consistency among regional offices

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### Proposed Operator Licensing Internal Process Changes

- Appeal review changes
  - Elimination of informal staff reviews starting in FY17
- Examination Waivers and Excusals
  - NRC staff continues to work to find an option for earlier determination on waiver and excusal requests
- Claims of bias/prejudice
  - Will be handled in accordance with existing NRC processes

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### Action Plan Timeline

Year	Month	Activity
2015	May	Write Draft
	June	
	July	Internal comments, edits and review
	Aug	
2016	Jan	Draft FRN, Publish Draft
	Feb	
	Mar	Public Comment Period It may be necessary
	Apr	
May	Post Comment Edits	
June		
July	OCC Review	
Aug		
2016	Aug	ADN/DSI Final Review and Commencement
	Aug	Submit FRN
2016	Aug	August 15 <sup>th</sup> Publish Revision 11
	Aug	August 15 <sup>th</sup> Publish Revision 11

NUREG 1021  
 545 pages  
 23 sections, 6 appendices

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