

Industry Perspective on the Initial Operator Licensing Process

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(LOFG)

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NEI LOFG

- NEI sponsored group, formed in 1998
- 11 members representing industry in all 4 regions, plus INPO and NEI representatives
- Responsible for collaborating on changes to NUREG 1021 from rev. 7 to current
- Meet 2 – 3 times annually

NUREG 1021 Rev. 11

- Most revised version in several years
- Applaud changes to waiver and appeal processes
- Industry Issues:
 - Simulator grading changes
 - Generic Fundamentals Examinations are an issue
 - Industry believes neither are appropriate nor necessary

Simulator Grading Changes

- March 2014 ASLB Vogtle licensing decision
- NRC Staff: simulator grading process being changed to *“to more accurately reflect candidate performance”*
- NRC Staff: may result in between 2% and 10% more simulator examination failures
- Are 2% - 10% of our newly licensed operators wrongly licensed?

Simulator Grading Changes

- ASLB noted no issues with simulator grading process
- ASLB: *“...had the Staff conducted its administrative review of the grading of the simulator portion of [the candidate’s] 2012 SRO exam in accordance with its guidance and in a fair and even-handed manner, [the candidate] would have passed the 2012 simulator exam...”*

Simulator Grading Changes

- Lesson Learned Review Team:

“Overall, the team concluded that the licensed operator examination process is an extremely high quality process that has been demonstrated over time to successfully evaluate and discriminate the level of competency of operator license applicants. The recommendations made by the team should be viewed as enhancements to promote consistency across the regions and improve the scrutability of waiver and appeal processes. None of the team’s recommendations were viewed as requiring urgent resolution.”

Generic Fundamentals Examination (GFE)

- In place since late 1980s
- Not directly required by 10 CFR 55
- Offered in March, June, September, December
- Anchors start of 18 – 24 month license class
- Project AIM eliminates June and December examinations
- 2 GFEs challenges NRC resources

Generic Fundamentals Examination

- Industry desires elimination or on-demand examination
- With concessions, could be a reality by 2018
 - Eliminate 5 modified, 5 new questions
 - Could use INPO NANTeL platform
- Industry Chief Nuclear Officers do not support assuming NRC burden and cost without concessions

Closing

- Delay publishing NUREG 1021 to resolve key issues
- Contentions do not diminish great work by NRC staff
 - Nearly 20 years of collaboration with industry through NEI LOFG
- Let's get this last piece right – together

Thank You!

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