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Operator Licensing Examination Standards for Power Reactors, NUREG-1021, Revision 11

**Comment On:** NRC-2016-0006-0013

Operator Licensing Examination Standards for Power Reactors; Reopening of Comment Period

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RULES AND DIRECTIVES  
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10/10**General Comment**

The following comments address changes in NUREG-1021. The comments are submitted by Robert Meyer on behalf of the Professional Reactor Operator Society.

Based on the NEI/NRC Operator Licensing Workshop in Tampa this year, the NRC is unduly raising the difficulty of the exams for initial licensing and requalification exams. For instance, the NRC's buzzword at the Workshop was, 'adequate mental activity.' This is not an accepted academic principle or foundation that is a substitute for simple cognition. This is an example of the NRC adopting a way of doing business prior to due regulatory process. The other incident of unacceptable standard injection into the licensing process was when green findings were issued due to using computers during the exam process. The operators use the computer in the control room on a daily basis. The way we test need to match the way we do business in the control room. Not being able to put the title of the procedure in the question is also a poor practice. The only way to exam on specific decision points in a procedure is to give the name of the procedure and the step the examinee is performing in that procedure. You an examinee is put at a particular point in the procedure, you can assess the specific knowledge of that step. Assessing if the examinee knows what procedure is in, unnecessarily adds a layer the question that is not required or needed. One concept, on question. Most every plant has heard that the questions now have to be attorney proof. The distractions have to be so plausible, it increases the possibility of a question with two correct answers. There is no longer room for reason.

The NRC is proposing shifting the grading scale for initial dynamic evaluations from a rating factor This downward shifting of the grading scale without adding a number at the positive end of scale (4). This alone will increase the failure rate, as indicated by an NRC conducted study.

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Add= M. Scheetz (mcst)  
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The NRC is considering no limit on the number of rating factors for a single performance deficiency. This will only promote more inconsistency. The correct and fair standard would be one performance deficiency, one rating in one competency.

Another change held in contention is every T.S. missed would result in a point reduction. Some scenarios will present themselves with more opportunities to fail. One scenario may have 5 T.S. calls, whereas another may contain 12 to 15 T.S. calls. Uniform conditions for the examination process will suffer.

The current revision of the NUREG requires one SRO administrative JPM for each exam. The new requirement will require all administrative JPMs given to the SROs be at the SRO level. The adverse impact is that there are SROs that actually perform as ROs. The RO level of knowledge that the SROs perform at the RO level will remain, possibly untested. This will increase the burden for the utilities to create already difficult administrative SRO JPMs.

The proposed change, in an attempt to maintain exam integrity requires each candidate be given at least one new or significantly modified scenario that the candidate did not have an opportunity to rehearse or practice. A significant modification is that at least two events, malfunctions, or initial conditions be replaced or significantly altered such that the operators will not recognize them from the two previous NRC exams. Any exams with the same major events should be changed or altered to change the course of the emergency procedure implementation flow path. It is commonly understood that all major events be broadly sampled over the course of the examinations. It is also understood that no major events should be left out without justification. Currently, using bank exams must be altered to prevent candidates from recognizing the events based on initial conditions.

Each scenario under the proposed NUREG must have at least two critical tasks. The current NUREG revision allows the NRC Chief Examiner to determine that only one critical task is adequate if there is enough complexity for a proper evaluation. The current rule states, "The quantitative attribute target ranges that are specified on the form are not absolute limitations' some scenarios may be an excellent evaluation tool, but may not fit within the ranges." Therefore the current limitations are adequate, and the proposed changes would reduce flexibility in the determination of examination adequacy.

The requirement of an upgrade to take another physical within the boundaries of their current physical examination requirements while holding a license is an unreasonable burden.

Leave the grading criteria the same for an upgrade and an instant SRO pertaining to an RO/SRO exam average.

Have the utilities develop the GFE exams.

Expand time frames for exam milestones.

Build in 2 to 3 days for the NRC Chief Examiner to meet one-on-one with exam groups at plants prior to initiation of exam development to gain common ground on NRC Examiner standards and expectations.