



**Luminant**

**Kenneth J. Peters**  
Senior Vice President  
& Chief Nuclear Officer  
Kenneth.Peters@luminant.com

**Luminant Power**  
P.O. Box 1002  
6322 North FM 56  
Glen Rose, TX 76043

**T** 254 897 6565  
**C** 817 776 0037  
**F** 254 897 6652

CP-201600437  
TXX-16069

Ref: NUREG 1021, Rev.11

May 5, 2016

U.S. Nuclear Regulatory Commission  
Office of Administration  
OWFN-12-H08  
Washington, DC 20555-0001  
ATTN: Ms. Cindy Bladey

2/5/2016  
81FR 6301-1  
(23)

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2016 MAY 13 PM 2:35

RULES AND REGULATIONS  
U.S. NUCLEAR REGULATORY COMMISSION

**SUBJECT:** COMANCHE PEAK NUCLEAR POWER PLANT  
DOCKET NOS. 50-445 & 50-446  
COMMENTS ON DRAFT NUREG 1021 REV. 11, "OPERATOR LICENSING  
EXAMINATION STANDARDS FOR POWER REACTORS"

**REFERENCE:** 1) Federal Register Notice/Vol. 81, No. 42/ March 3, 2016

Dear Ms. Bladey:

Per Reference 1, Luminant Generation Company LLC (Luminant Power) is submitting comments on the draft NUREG 1021, Rev. 11, "Operator Licensing Examinations Standard for Power Reactors.

If there are any questions concerning this submittal, contact Mr. Garry W. Struble at (254) 897-6628 (office) or (254) 396-6286 (cell).

Sincerely,

Luminant Generation Company LLC

Kenneth J. Peters

By:

Thomas P. McCool  
Site Vice President

SCD

**SUNSI Review Complete**  
**Template = ADM - 013**  
**E-RIDS= ADM-03**  
**Add= m. schultz (mcs7)**  
**T. Kelch (TKS)**

Attachment - Comanche Peak Comments on Draft NUREG-1021, Revision 11

c - Marc L. Dapas, Region IV clo  
Vincent Gaddy, Region IV clo  
M. Watford, NRR clo  
Resident Inspectors, CPNPP clo

**Comanche Peak Comments on Draft NUREG-1021, Revision 11  
"Operator Licensing Examination Standards for Power Reactors"**

ID	Section and Page	Comment	Proposed Resolution
	Appendix D, C.1.f Pages D-7 and D-8	<p>The new 50% overlap requirement will likely result in less operationally challenging exams. Current scenarios are developed containing a complexity of events to discriminate between a competent and incompetent operator. The new overlap requirement will lead to use of malfunctions and events that are less discriminating. Most simulators have hundreds of malfunctions but a small percentage actually leads to observable discriminatory actions. There are also a very small number of major events. It is true that there are variable cause, location and size LOCAs, MSLBs, SGTRs, and Loss of All AC Power malfunctions but the ERGs lead essentially to the same conclusion for these major events. For LOCAs it is either cold leg recirculation, post LOCA cooldown and depressurization or loss of emergency recirculation. The overlap limitation will also lead to longer than 2 hour scenarios as the path to all but a limited number of contingency procedures and functional restoration guidelines coupled with the minimum number of opportunities for each position takes significantly more time. This requirement will also challenge validation resources at each station as more time will be required to validate the scenarios with current licensed operators, which in turn challenges the work hour rule regulations.</p>	<p>This requirement should be excluded from the revision as it will only serve to fatigue the applicants during administration and the examination writers during development. It will also challenge federal work hour rule regulations for validation purposes. With strained validation prior to NRC on site validation this change will also likely lead to more changes during the on-site validation.</p> <p>Ensure that Form 301-4 is not revised with the 50% overlap requirement.</p>

	ES-301, D.5.b Page 15 of 31	The new 50% overlap requirement will likely result in less operationally challenging exams. Current scenarios are developed containing a complexity of events to discriminate between a competent and incompetent operator. The new overlap requirement will lead to use of malfunctions and events that are less discriminating. Most simulators have hundreds of malfunctions but a small percentage actually leads to observable discriminatory actions. There are also a very small number of major events. It is true that there are variable cause, location and size LOCAs, MSLBs, SGTRs, and Loss of All AC Power malfunctions but the ERGs lead essentially to the same conclusion for these major events. For LOCAs it is either cold leg recirculation, post LOCA cooldown and depressurization or loss of emergency recirculation. The overlap limitation will also lead to longer than 2 hour scenarios as the path to all but a limited number of contingency procedures and functional restoration guidelines coupled with the minimum number of opportunities for each position takes significantly more time. This requirement will also challenge validation resources at each station as more time will be required to validate the scenarios with current licensed operators, which in turn challenges the work hour rule regulations.	<p>This requirement should be excluded from the revision as it will only serve to fatigue the applicants during administration and the examination writers during development. It will also challenge federal work hour rule regulations for validation purposes. With strained validation prior to NRC on site validation this change will also likely lead to more changes during the on-site validation.</p> <p>Ensure that Form 301-4 is not revised with the 50% overlap requirement.</p>
	ES-303, D.1.d Page 3 of 9	New method of grading TS evaluation opportunities will result in unbalance difficulty between exams. Under current guidelines each event can only have 1 TS evaluation for a design target of 2, as that not all Technical Specification component failures are not equal, the new requirement will result in some applicants having significantly more opportunities to fail.	This requirement should be excluded from the revision OR add clarification that a single event that requires 2 TS action statements to be entered will meet minimum design criteria. While this solution will not completely eliminate the concern, it makes it much more manageable when designing quality exams.
	ES-303, D.2.b Pages 5 & 6 of 19	Changing the lowest rating factor from 1 to 0 is unnecessary and will requires facilities to expend resources aligning current practices and procedures to the change. NRC examiners and the NUREG already recognizes that sometimes the grading does not match the performance and judgment is required for a licensing decision. See ES-303 Section 2, Page 1-19 Lines 4-8 for further details. This change will expend significant resources for what experience has shown is less than a 1% occurrence.	<p>Retain the guidance in NUREG 1021, Revision 10 and make it a practice of using the guidance in ES-303 Section 2, Page 1-19 Lines 4-8 to resolve conflicts between the calculated grade and the judgment of the examiner.</p> <p>Ensure that Forms ES-303-1, ES-303-3, and ES-303-4 are not revised with the 0, 1, 2, 3 grading scales.</p>

	ES-303, D.2.b Page 5 of 19	<p>The proposed language of Revision 11 eliminates the allowance to give points back for noncritical errors. This allowance was necessary to provide a candidate who is competent but makes just a few errors to be penalized without relief.</p> <p>During a scenario an applicant can have multiple chances to show competency in an area. Some scenarios provide more than the expected three chances and therefore can fail the applicant who is at the minimum standard. The practice of allowing points back can provide the examiner a better picture of the candidate's ability. Due to the number ratings being revised to a more stringent criteria, this is even more important to the rating of the candidate than in previous exams.</p>	<p>Retain the guidance in NUREG 1021, Revision 10, <i>"If an applicant makes a single error related to a rating factor, circle an "If an applicant makes two errors related to a rating factor, circle an "RF Score" of "1" for that rating factor unless the applicant correctly performed another activity (or activities) related to the same rating factor, in which case the "RF Score" shall remain at "2." In either case, a justification of the "RF Score" shall be documented on the applicant's Form ES-303-2. For example, a score of "1" shall include documentation such as "the applicant correctly performed no other activities related to this RF during the simulator operating test"; whereas a score of "2" shall include documentation such as "the applicant correctly performed another activity associated to this rating factor". As stated above, if an error is related to a critical task then this requires an "RF Score" of "1."</i></p>
	ES-303, D.2.b Page 6 of 19	<p>In the proposed revision, a missed critical task (CT) would result in a 3 point reduction with a score of 0. This appears to over penalize the applicant. Revision 10 had a decrease of 2 points for this issue and since a 0 has more consequences on the overall grade, consideration should be given to a 2 point deduction. If the applicant has more issues past 1 Critical error, they will appear and be graded in other areas, which would then lead to failure of the applicant.</p>	<p>Retain the guidance in NUREG 1021, Revision 10 with regard to critical errors.</p>