

Vogle PEmails

From: Hoellman, Jordan
Sent: Friday, August 24, 2018 9:17 AM
To: Vogle PEmails
Subject: Draft Exemption Request and Draft NRC Form 398 for Transferring Operator Pass Letters from VCS to VEGP Docket
Attachments: ND-18-1126_Operator Exam_Exemption_Draft_PreSub Mtg.pdf; NRC Form 398 Block 25 Example.pdf; NRC Form 398 Example redacted.pdf

The attached draft exemption request and draft NRC Form 398/Block 25 comments are being provided to support a requested 9/6 pre-submittal meeting. Please let me know if staff can support the requested 9/6 pre-submittal meeting. The documents have placeholders for personally identifiable information (PII), but all PII has been removed for the purposes of supporting the pre-submittal meeting. Thus, the entirety of the attached documents can be made available to the public; final submittal will have withheld PII.

Please note that the approach in these documents differs from what was discussed below. Specifically, the NRC Form 398 has been drafted assuming the exemption has already been granted, and a waiver from the written and operating exam have been checked on the form (with the exemption provided as the basis for the waiver). These changes were made based on discussions with Region II, who is responsible for signing off the NRC Form 398. We are providing the draft NRC Form 398 concurrently with exemption request to ensure alignment among all organizations with this approach and to ensure that there are no other exemption requests needed to support approval of the forms.

Please let me know if you have questions.

Thanks!

From: Patel, Chandu [<mailto:Chandu.Patel@nrc.gov>]
Sent: Monday, July 2, 2018 11:24 AM
To: Roberts, Kelli Anne
Cc: Hoellman, Jordan
Subject: RE: RE: Follow up to June 28th meeting for Vogle 3 and 4

Hi Kelli,

Jordan and Lauren are on leave this week. Lauren is gone until July 16th. Also, I wanted to let you know that I had VogtlPEmail on distribution. So, your e-mail will go to public also. Do we want to have some discussion or can you wait until Jordan comes back next week for the sake of consistency?

Thanks,
Chandu

From: Roberts, Kelli Anne [<mailto:KROBERTS@southernco.com>]
Sent: Monday, July 02, 2018 10:42 AM
To: Patel, Chandu <Chandu.Patel@nrc.gov>; Hoellman, Jordan <Jordan.Hoellman2@nrc.gov>; Nist, Lauren <lauren.nist@nrc.gov>
Cc: Vogle PEmails <Vogle.PEmails@nrc.gov>
Subject: [External_Sender] RE: Follow up to June 28th meeting for Vogle 3 and 4

Thank you for following up, Chandu.

We can certainly submit applications prior to or concurrently with the exemption request. I want to make sure we're in alignment on how exemption request relates to NRC Form 398 applications. Per Jordan's 6/19 email, "the staff thinks the proper regulation to seek the exemption from is 55.33(a)(2) rather than 55.47."

Should an exemption from 55.33(a)(2) be approved, there would be no need to request a waiver from written and operating exam on NRC Form 398 since the candidates would be exempt from that requirement. If SNC submits the exemption request and package of NRC Form 398s concurrently, then we could note the exemption request under the comments box #17 on the form. Is this consistent with what staff was thinking?

Thanks,

From: Patel, Chandu [<mailto:Chandu.Patel@nrc.gov>]
Sent: Monday, July 2, 2018 9:50 AM
To: Roberts, Kelli Anne; Hoellman, Jordan; Nist, Lauren
Cc: Vogtle PEmails
Subject: Follow up to June 28th meeting for Vogtle 3 and 4

[Hi Kelli,](#)

[I got the following response to your question.](#)

Comment

At the public meeting on 6/28/18, SNC asked a question about completion of the NRC Form 398 (applications). The staff discussed the question after the meeting and determined there needs to be an application in front of the staff in order to consider granting an exemption. Therefore, the applications should be submitted prior to or concurrently with the exemption request.

Please let me know if you have any questions or comments.

Sincerely,
Chandu Patel

Hearing Identifier: Vogtle_COL_Docs_Public
Email Number: 346

Mail Envelope Properties (SN6PR0901MB236630D2A1A19D0A91F7ACDFD5360)

Subject: Draft Exemption Request and Draft NRC Form 398 for Transferring Operator
Pass Letters from VCS to VEGP Docket
Sent Date: 8/24/2018 9:17:19 AM
Received Date: 8/24/2018 9:17:36 AM
From: Hoellman, Jordan

Created By: Jordan.Hoellman2@nrc.gov

Recipients:
"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>
Tracking Status: None

Post Office: SN6PR0901MB2366.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	3962	8/24/2018 9:17:36 AM
ND-18-1126_Operator Exam_Exemption_Draft_PreSub Mtg.pdf		217480
NRC Form 398 Block 25 Example.pdf	323591	
NRC Form 398 Example redacted.pdf	971756	

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

September XX, 2018

Docket Nos.: 52-025
52-026

ND-18-1126
10 CFR 55.11
10 CFR 55.33(a)(2)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Mr. Frederick D. Brown
Director, Office of New Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

**Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Request for Exemption from Operator Written Examination and Operating Test**

Ladies and Gentlemen:

Pursuant to 10 CFR 55.11, "Specific Exemptions," Southern Nuclear Operating Company (SNC) requests, on behalf of the former Virgil C. Summer Nuclear Station, Units 2 and 3 (VCSNS 2&3) licensed operator candidates listed in Enclosure 2, an exemption from the requirement of 10 CFR 55.33(a)(2), "Written examination and operating test." Passing the requisite written examination and operating test is a requirement for approval of an initial application for a license as specified in 10 CFR 55.33, "Disposition of an initial application."

Following the closure of VCSNS 2&3, twelve licensed operator candidates trained at VCSNS 2&3 were hired by Vogtle Electric Generating Plant, Units 3 and 4 (VEGP 3&4). The twelve licensed operator candidates successfully completed a written examination and an operating test while employed at VCSNS 2&3.

Accordingly, in lieu of the requirement of 10 CFR 55.33(a)(2), these former VCSNS 2&3 licensed operator candidates wish to transfer their test pass letters, for written examinations and operating tests taken at VCSNS 2&3, to VEGP 3&4 (License Numbers NPF-91 and NPF-92, respectively).

The exemption will ensure SNC has a requisite number of licensed operators prior to fuel load for VEGP Unit 3.

Enclosure 1 to this letter presents SNC's detailed basis for the exemption. Enclosure 2 provides the list of operator candidates requesting transfer of their pass letters.

This letter contains no regulatory commitments. This letter has been reviewed and determined not to contain security-related information.

SNC requests NRC staff approval of the requested exemption by February 1, 2019.

Should you have any questions, please contact Ms. Kelli Roberts at (706) 848-6991.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the XXth of September 2018.

Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director
Southern Nuclear Operating Company

Enclosure 1: Request for Exemption from Operator Written Examination and Operating Test

Enclosure 2: Operator Candidates Requesting Transfer of Their Pass Letters (Personally Identifiable Information- Withhold Under 10 CFR 2.390)

cc: **TBD**

Southern Nuclear Operating Company / Georgia Power Company

Nuclear Regulatory Commission

Oglethorpe Power Corporation

Municipal Electric Authority of Georgia

Dalton Utilities

Other

Southern Nuclear Operating Company
Vogtle Electric Generating Plant (VEGP) Units 3 and 4

ND-18-1126

Enclosure 1

Request for Exemption from Operator Written Examination and Operating Test

(This Enclosure consists of 10 pages, including this cover page)

1.0 Summary Description

Pursuant to 10 CFR 55.11, "Specific Exemptions," Southern Nuclear Operating Company (SNC) requests, on behalf of the former Virgil C. Summer Nuclear Station, Units 2 and 3 (VCSNS 2&3) licensed operator candidates listed in Enclosure 2, an exemption from the requirement of 10 CFR 55.33(a)(2), "Written examination and operating test." In lieu of this requirement for approval of an initial application, former VCSNS 2&3 licensed operator candidates wish to transfer their test pass letters, for written examinations and operating tests taken at VCSNS 2&3, to Vogtle Electric Generating Plant, Units 3 and 4 (VEGP 3&4).

2.0 Detailed Description

Passing the requisite written examination and operating test is a requirement for approval of an initial application for a license as specified in 10 CFR 55.33, "Disposition of an initial application." 10 CFR 55.33(a)(2) states, in part, "The examinations and tests determine whether the applicant for an operator's license has learned to operate a facility competently and safely, and additionally, in the case of a senior operator, whether the applicant has learned to direct the licensed activities of licensed operators competently and safely." Written tests for operators and senior operators contain a representative selection of knowledge, skills, and abilities needed to perform the operator's respective duties. Representative samples of items to be tested on a written exam, for operators and senior operators, are provided in 10 CFR 55.41 or 10 CFR 55.43, respectively. Operating tests require the applicants to demonstrate an understanding of and the ability to perform the actions necessary to accomplish their duties. A representative sample of items to be tested during the operating tests is provided in 10 CFR 55.45.

SNC and South Carolina Electric & Gas Company (SCE&G) worked together to develop training material, for licensed operator candidates, that met the guidance in Nuclear Energy Institute (NEI) 06-13A, "Template for an Industry Training Program Description." The criteria in NUREG-1021, "Operator Licensing Examination Standards for Power Reactors; Final Report," was used to prepare written examinations and operating tests as required by 10 CFR 55. The Commission approved the content of all administered written examinations and operating tests.

Following the closure of VCSNS 2&3, twelve licensed operator candidates trained at VCSNS 2&3 were hired by VEGP 3&4. The twelve licensed operator candidates had successfully completed the written examination and operating test while employed at VCSNS 2&3. Following completion of the examination, the candidates were enrolled into a Systematic Approach to Training (SAT)-based continuing training program at VCSNS 2&3. The candidates are currently enrolled in a SAT-based continuing training program at VEGP 3&4.

The AP1000 is designed to be a standard plant. VCSNS 2&3 and VEGP 3&4 are of similar age and power level, and share the same vendor and similar design. The examinations administered at VCSNS 2&3 and VEGP 3&4 tested common AP1000 systems; the examinations did not test systems which are unique to one facility. Due to

design standardization, as well as collaboration between VCSNS 2&3 and VEGP 3&4 during examination development, no gaps in the material tested have been identified.

Accordingly, in lieu of the requirement of 10 CFR 55.33(a)(2), former VCSNS 2&3 licensed operator candidates wish to transfer their test pass letters, for written examinations and operating tests taken at VCSNS 2&3, to VEGP 3 &4.

The exemption, from the requirement of 10 CFR 55.33(a)(2), is being requested on behalf of the VEGP 3&4 licensed operator candidates identified in Enclosure 2 of this letter.

3.0 Applicable Regulatory Requirements

This section provides a summary of regulations applicable to this exemption request.

3.1 Atomic Energy Act of 1954, as amended (42 USC. 2137)

Section 107, "Operators' Licenses," states, in part, that:

The Commission shall- a. prescribe uniform conditions for licensing individuals as operators of any of the various classes of production and utilization facilities...

3.2 10 CFR Part 55, "Operators' Licenses"

Section 55.33, "Disposition of an initial application," states, in part, that:

(a) *Requirements for the approval of an initial application.* The Commission will approve an initial application for a license pursuant to the regulations in this part, if it finds that –

...

(2) *Written examination and operating test.* The applicant has passed the requisite written examination and operating test in accordance with 55.41 and 55.45 or 55.43 and 55.45. These examinations and tests determine whether the applicant for an operator's license has learned to operate a facility competently and safely, and additionally, in the case of a senior operator, whether the applicant has learned to direct the licensed activities of licensed operators competently and safely.

Section 55.40, "Implementation," states, in part, that:

(a) *The Commission shall also use the criteria in NUREG-1021 to evaluate the written examinations and operating tests prepared by power reactor facility licensees pursuant to paragraph (b) of this section.*

(b) *Power reactor facility licensees may prepare, proctor, and grade the written examinations required by 55.41 and 55.43 and may prepare the operating tests required by 55.45, subject to the following conditions:*

(1) *Power reactor facility licensees shall prepare the required examinations and tests in accordance with the criteria in NUREG-1021 as described in paragraph (a) of this section*

...

- (4) *Power reactor facility licensees must receive Commission approval of their proposed written examinations and operating tests.*

3.3 NUREG-1021, Revision 11, "Operator Licensing Examination Standards for Power Reactors; Final Report"

ES-201, "Initial Operator Licensing Examination Process"

Section B, "Background," states, in part, that:

Title 10 of the Code of Federal Regulations (10 CFR) Part 55, "Operators' Licenses," requires that applicants for reactor operator (RO) and senior reactor operator (SRO) licenses must pass both a written examination and an operating test. The regulation at 10 CFR 55.40(b) allows power reactor facility licensees to prepare the site-specific written examinations and operating tests provided that (1) the facility licensee shall prepare the examinations and tests in accordance with the criteria contained in this NUREG, (2) the facility licensee shall establish, implement, and maintain procedures to control examination security and integrity, (3) an authorized representative of the facility licensee shall approve the examinations and tests before they are submitted to the NRC for review and approval, and (4) the facility licensee shall obtain NRC approval of its proposed written examinations and operating tests. The regulation requires that the license examinations must be developed and administered in accordance with 10 CFR 55.41, "Written Examination: Operators," and 10 CFR 55.45, "Operating Tests," for ROs, or 10 CFR 55.43, "Written Examination: Senior Operators," and 10 CFR 55.45 for SROs.

ES-202, "Preparing and Reviewing Operator Licensing Applications"

Section B, "Background," states, in part, that:

In accordance with Title 10 of the Code of Federal Regulations (10 CFR) 55.31(a)(4), an applicant shall do the following:

Provide evidence that the applicant has successfully completed the facility licensee's requirements to be licensed as an operator or senior operator and of the facility licensee's need for an operator or a senior operator to perform assigned duties. An authorized representative of the facility licensee shall certify this evidence on Form NRC-398. This certification must include details of the applicant's qualifications, and details on courses of instruction administered by the facility licensee, and describe the nature of the training received at the facility, and the startup and shutdown experience received. In lieu of these details, the Commission may accept certification that the applicant has successfully completed a Commission-approved training program that is based on a systems approach to training [SAT] and that uses a simulation facility acceptable to the Commission under [10 CFR 55.45(b)].

ES-301, "Preparing Initial Operating tests"

Section B, "Background," states, in part, that:

*To the extent applicable, the operating test will require the applicant to demonstrate an understanding of, and the ability to perform, the actions necessary to accomplish a representative sampling of the 13 items identified in 10 CFR 55.45(a). (All 13 items do **not** need to be sampled on every operating test). In addition, the content of the operating test will be identified, in part, from learning objectives contained in the facility licensee's training program and information in the final safety analysis report, system description manuals and operating procedures, the facility license and amendments thereto, licensee event reports, and other materials that the Commission requests from the facility licensee.*

ES-401N, "Preparing Initial Site-Specific Written Examinations"

Section B, "Background," states, in part, that:

The ES-401N applies to new reactors licensed under 10 CFR Part 52. The content of the written licensing examinations for ROs and SROs is dictated by 10 CFR 55.41, "Written Examinations: Operators," and 10 CFR 55.43, "Written Examinations: Senior Operators," respectively. Each examination shall contain a representative selection of questions concerning the knowledge and abilities (K/As) and skills needed to perform duties at the desired license level. Both the RO and SRO examinations will sample the 14 items specified in 10 CFR 55.41(b), and the SRO examination will also sample the 7 additional items specified in 10 CFR 55.43(b).

Except as noted in Section D.1.b of this examination standard, NUREG-2103, "Knowledge and Abilities Catalog for Nuclear Power Plant Operators: Westinghouse AP1000 Pressurized-Water Reactors," ... provide the basis for developing content-valid operator licensing examinations. Each K/A stem statement has been linked to an applicable item number in 10 CFR 55.41 and/or 10 CFR 55.43. Preparing the license examination using the appropriate K/A catalog, in conjunction with the instructions in this NUREG-series report, will ensure that the examination includes a representative sample of the items specified in the regulations.

3.4 NEI 06-13A, Revision 2, "Template for an Industry Training Program Description"

NEI 06-13A was incorporated into the VEGP 3&4 UFSAR, Section 13.2A, by License Document Change Request, LCDR 2013-047.

Section 1.1, "Licensed Operator Training," states, in part, that:

The Reactor Operator (RO) and Senior Reactor Operator (SRO) training programs, including initial and requalification training, provide the means to train individuals in the knowledge, skills, and abilities needed to perform licensed operator duties... Before initial fuel loading, the number of persons trained in preparation for RO and SRO licensing examinations will be sufficient to meet regulatory requirements, with allowances for examination contingencies and without the need for planned overtime.

3.5 NUREG-2103, "Knowledge and Abilities Catalog for Nuclear Power Plant Operators"

Section 1.1, "Introduction," states:

The Knowledge and Abilities Catalog for Nuclear Power Plant Operators: Westinghouse AP1000 NUREG-2103 provides the basis for development of content-valid written and operating licensing examinations for reactor operators (ROs) and senior reactor operators (SROs). The Catalog is designed to ensure equitable and consistent examinations.

Section 1.2, "Part 55 of Title 10 of the Code of Federal Regulations," states:

The catalog is used in conjunction with NUREG-1021 "Operator Licensing Examination Standards for Power Reactors." NUREG-1021 provides policy and guidance and establishes the procedures and practices for examining licensees and applicants for RO and SRO licenses pursuant to Part 55 of Title 10 of the Code of Federal Regulations (10 CFR 55). All knowledge and abilities (K/As) in this catalog are directly linked by item number to 10 CFR 55.

4.0 Technical Justification of Acceptability

The licensed operator candidates identified in Enclosure 2 have been trained using common AP1000 training material and have passed all portions of a written examination and an operating test given at VCSNS 2&3. The content and substance of the licensing examinations and tests given to licensed operator candidates at VCSNS 2&3 and VEGP 3&4 are developed from a consistent set of AP1000 materials and provide a common basis for evaluating candidates' qualifications with respect to these substantially-similar facilities.

- A training task list was created by the AP1000 owners group and adopted by both SNC and SCE&G. The knowledge and abilities defined in NUREG-2103, "Knowledge and Abilities Catalog for Nuclear Power Plant Operators: Pressurized Water Reactors Westinghouse AP1000," were used in training and evaluating operators at both VCSNS 2&3 and VEGP 3&4.

- Training material, for operators at VCSNS 2&3 and VEGP 3&4, was created using common procedures and references provided to the utilities by Westinghouse Electric Company. Training material was jointly developed by SNC and SCE&G. Training programs were established consist with NEI 06-13A, "Template for an Industry Training Program Description."
- The content of the examinations and the tests developed by SNC and SCE&G complied with the requirements of 10 CFR 55 and NUREG-1021 and drew from a common set of AP1000 materials.
- Examinations and tests were developed to assess the knowledge, skills, and abilities needed by operators to perform assigned tasks common to both VCSNS 2&3 and VEGP 3&4. Site-specific tasks were not trained on or evaluated for license purposes.

A gap analysis was conducted by VEGP senior reactor operator (SRO) certified training instructors and former VCSNS 2&3 SRO candidates to identify areas where gap training may be required for former VCSNS 2&3 licensed operator candidates. Differences noted were limited to fleet and site-specific conduct of operations procedures.

An evaluation of the simulators used for the tests revealed no testable variances. The commission-approved simulation facilities used at VEGP 3&4 and VCSNS 2&3 were designed by WEC. Minor differences between the simulation facilities were identified during a gap analysis. VCSNS used the original WEC design where VEGP made minor tuning and system response related changes. The gap analysis concluded that differences between the simulation facilities would not have affected operator responses or decision making.

Since the VCSNS 2&3 candidates were hired by SNC, the following steps have been taken to address site-specific gaps in these candidates' training and evaluation:

- Training on the VEGP 3&4 site Emergency Plan Implementing Procedure (EPIP) was delivered to the candidates identified in Enclosure 2 using the same material provided to VEGP 3&4 initial licensed operator candidates in their post-NRC exam transition training.
- Procedure gap training was conducted by self-study of VEGP 3&4 conduct of operations procedures with instructors available to assist and answer questions. All candidates identified in Enclosure 2 completed procedure gap training and passed written examinations covering topics within the procedures.

All operator license candidates that successfully completed the written examination and operating test, including operators listed in Enclosure 2, have been enrolled in a SAT-based continuing training program to maintain proficiency of acquired knowledge and abilities to perform assigned tasks. The SAT-based continuing programs at VEGP 3&4 and VCSNS 2&3 are functionally equivalent. The continuing training is based on a continuous two-year cycle.

- The continuing training program is based on the requirements defined in 10 CFR Part 55 and is accredited through the National Academy for Nuclear Training.
- The continuing training program uses a systematic approach to training to maintain operator proficiency for the major subject areas and topics that define the reactor operator and senior reactor operator qualification programs.
- Enrollment in and passage of the continuing training program ensures operator license candidate knowledge retention is consistent with standards recognized in NRC regulations and NUREG-1021.

In summary, variances between the training programs of the two utilities were reconciled by conducting gap training on site-specific emergency and administrative procedures. Written examinations administered at VCSNS 2&3 were prepared using the same knowledge and abilities catalog used at VEGP 3&4 and provide a common basis for evaluating candidates' qualifications with respect to these substantially-similar AP1000 facilities. Following successful completion of the licensed examination, the candidates identified in Enclosure 2 were enrolled in a SAT-based continuing training program. The results of the licensed examination and test indicate licensed operator candidates have learned to operate an AP1000 facility competently and safely. Therefore, transferring the test pass letters, for written examinations and operating tests taken at VCSNS 2&3, to VEGP 3&4, is an acceptable alternative to having these candidates reperform the examinations and tests at VEGP 3&4.

5.0 Regulatory Evaluation

Exemptions from the provisions in 10 CFR Part 55 are governed by 10 CFR 55.11, "Specific Exemptions." That regulation states:

The Commission may, upon application by an interested person, or upon its own initiative, grant such exemptions from the requirements of the regulations in this part as it determines are authorized by law and will not endanger life or property and are otherwise in the public interest.

The requested exemption satisfies the criteria for granting specific exemptions, as described below.

5.1 This exemption is authorized by law

The Commission has the authority to issue the requested exemption. The exemption would not conflict with any provision of the Atomic Energy Act (AEA) or any other law.

Specifically, Section 107 of the AEA states, in part, that the Commission shall (a) "prescribe uniform conditions for licensing individuals as operators of... utilization facilities licensed" by the NRC, and (b) "determine the qualifications of such individuals."

- The Commission has complied with subsection (a) through the promulgation of Part 55 and NUREG-1021. There is nothing in the AEA that prohibits the Commission from granting exemptions from the provisions in Part 55. The licensing written examination and operating test taken by the operator candidates from VCSNS 2&3 are essentially equivalent to those taken by the VEGP 3&4 operator candidates. The requirement governing uniformity is unaffected by the exemption request.
- The Commission will comply with subsection (b) through the licensing process for operator candidates at VEGP 3&4. The requirement governing operator qualifications is unaffected by the exemption request.

Accordingly, this requested exemption is authorized by law.

5.2 This exemption will not endanger life or property

The exemption does not pertain to the design, construction, or operating procedures of VEGP 3&4. Furthermore, as explained in Section 3 above, the exemption is consistent with ensuring that the operators will be competent and fully trained to safely operate the plant; the content and substance of the examinations and tests given at VCSNS 2&3 and VEGP 3&4 are comparable. The exemption would allow the pass letters of former VCSNS 2&3 operator candidates to be transferred from VCSNS 2&3 to VEGP 3&4. Therefore, the exemption will not endanger life or property.

5.3 This exemption is consistent with the public interest.

The proposed exemption from the requirements of 10 CFR 55.33(a)(2), would prevent former VCSNS operator candidates who successfully completed the written examination and operating test while employed by VCSNS from having to re-take them before receiving an operator license for VEGP 3&4. Requiring those candidates who thoroughly prepared and successfully completed the examination and the test to re-take them would be inequitable. The gap analysis demonstrated that the VCSNS operator candidates received equivalent training to those candidates at VEGP. Successful completion of the licensed examination and test indicate licensed operator candidates have learned to operate an AP1000 facility competently and safely; this ensures operation of the facility such that the public health and safety would not be adversely impacted. The exemption further supports the public interest by conserving NRC and licensee resources, while ensuring that operator license candidates satisfy the applicable requirements to obtain operator licenses. The exemption would avoid duplication of efforts and ensure trained personnel are available to support activities at VEGP 3&4.

Additionally, a delay in the licensing of these operators could make it more difficult to ensure that an adequate number of licensed operators are available when construction is completed, potentially resulting in a delay in operation of the plant. A delay in operation would result in additional costs and would deprive the region of an earlier carbon-free source of electrical generation. Accordingly, to avoid such adverse impacts, the exemption is in the public interest.

5.4 Significant Hazards Determination and Environmental Consideration

The proposed exemption has been evaluated against the criteria of 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review." The requested exemption meets the eligibility criteria set forth in 10 CFR 51.22(c)(25)(vi)(E).

The requested exemption would allow former VCSNS 2&3 licensed operator candidates to transfer their test pass letters, for written examinations and operating tests taken at VCSNS 2&3, to VEGP 3&4. The exemption does not make any changes to the facility or operating procedures and does not:

- a) involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), in that it does not:
 - alter the design, function or operation of any plant equipment. Therefore, granting this exemption would not increase the probability or consequence of any previously evaluated accident.
 - create any new accident initiators. Therefore, granting this exemption does not create the possibility of a new or different kind of accident from any accident previously evaluated.
 - exceed or alter a design basis or safety limit. Therefore, granting this exemption does not involve a significant reduction in a margin of safety.

Therefore, a finding of "no significant hazards considerations" is justified.

- b) involve any changes that would introduce any change to effluent types, affect any plant radiological or non-radiological effluent release quantities, or affect any effluent release paths, or the functionality of any design or operational features that are credited with controlling the release of effluents during plant operation. Therefore, it is concluded that the proposed exemption does not involve a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite.
- c) affect any plant radiation zones, nor change any controls required under 10 CFR Part 20 that preclude a significant increase in occupational radiation exposure. Therefore, it is concluded that the proposed exemption does not involve a significant increase in individual or cumulative occupational radiation exposure.
- d) involve any facility changes or change any construction activities. Therefore, there is no significant construction impact.
- e) alter the design, function, or operation of any plant equipment. Therefore, there is no significant increase in the potential for or consequences from radiological accidents.

Accordingly, the proposed exemption meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(25). Therefore, pursuant to

10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this exemption.

6.0 Precedent Exemption

None

7.0 References

1. 10 CFR Part 55, "Operators' Licenses"
2. NEI 06-13A, Revision 2, "Template for an Industry Training Program Description"
3. NUREG-1021, Revision 11, "Operator Licensing Examination Standards for Power Reactors; Final Report"
4. Atomic Energy Act of 1954, as amended, Section 107
5. NUREG-2103, Revision 0, "Knowledge and Abilities Catalog for Nuclear Power Plant Operators: Pressurized Water Reactors Westinghouse AP1000"

Southern Nuclear Operating Company
Vogtle Electric Generating Plant (VEGP) Units 3 and 4

ND-18-1126

Enclosure 2

Operator Candidates Requesting Transfer of Their Pass Letters
(Personally Identifiable Information- Withhold Under 10 CFR 2.390)

(This Enclosure consists of 2 pages, including this cover page)

<u>Operator Candidate</u>	<u>Docket Number</u>
Candidate	55-
Candidate	55-
Candidate	55-
Candidate	55-
Candidate	55-
Candidate	55-
Candidate	55-
Candidate	55-
Candidate	55-
Candidate	55-
Candidate	55-
Candidate	55-

Continuation of NRC FORM 398, Personal Qualification Statement

BLOCK 25, Comments

BLOCK 12 – Deferrals/Excusals/Waivers

Item a.1, ELIGIBILITY:

- **DEFERRAL:** A deferral is requested from the requirement of VEGP 3&4 UFSAR, Table 13.2A-201, Item 1, “Cold License Guidance” to complete “six months practical work assignments.”
 - VEGP 3&4 UFSAR:
 - Section 13.2A.1, “Licensed Operator Experience Requirements Prior To Commercial Operation,” lists six months practical work assignments as experience.
 - Section 13.2A.1 further states, “Experience and plant evolution requirements that have not been met at the time the licensed operator examination is administered shall be met prior to issuing the individual's NRC operator license. In such a case, the Licensee will notify the NRC when the applicant meets the experience and plant evolution requirements.”
 - 10 CFR Part 55, “Operators’ Licenses,” states in part that the Commission shall use the criteria in NUREG-1021, “Operator Licensing Examination Standards for Power Reactors.”
 - NUREG-1021, “Operator Licensing Examination Standards for Power Reactors:”
 - ES-202.C.2.d, states “In accordance with ES-204, the region may administer a license examination to an applicant who has not satisfied the applicable training or experience requirements at the time of the examination, but is expected to complete them shortly thereafter. Assuming that the applicant passes the examination, the regional office shall not issue the applicant’s license until the facility licensee certifies that all of the requirements have been completed. (Refer to ES-501 for additional guidance.)”
 - ES-202.D.4, “Cold License Eligibility,” states “Cold licensed operator applicants need not satisfy the RG 1.8 or NANT 2010 experience requirements before entering a licensed operator training program. The experience requirements that have not been met at the time the licensed operator examination is administered will be certified by the licensee as being complete prior to the individual’s NRC operator license being issued.”
 - ES-501.D.3.c, states “If the NRC granted an applicant a deferral and allowed him or her to take the examination before completing all of the training and experience requirements, the regional office shall normally not issue a license to the applicant until the facility licensee has certified in writing that the applicant has completed all of the deferred items.”
 - SNC equates six months practical work assignments to 1040 hours.
 - This applicant has completed **XXX** of the 1040 hours.

- Per the requirements of NUREG 1021, Section ES-202. C.2.d, the applicant anticipates completing the remaining XXX hours prior to the license being issued.
- Per the requirements of NUREG 1021, Section ES-202.D.4, the applicant understands that SNC must certify to the NRC that the applicant has completed the six months practical work assignments prior to the license being issued.

Item c.1 – NRC Written exam, Item c.2 – NRC Operating test

WAIVER: Pursuant to 10 CFR 55.11, “Specific Exemptions,” SNC requested, on behalf of the former V.C. Summer Nuclear Station (VCSNS) 2&3 licensed operator candidate, an exemption from the requirement of 10 CFR 55.33(a)(2), “Written examination and operating test.” The exemption has been approved. Hence, a waiver is requested for the written examination and operating test.

- Pursuant to 10 CFR 55.11, “Specific Exemptions,” SNC requested an exemption from the written examination and operating test requirement of 10 CFR 55.33, “Disposition of an initial application” for this applicant. 10 CFR Part 55.33(a)(2), “Written examination and operating test,” states, in part, examinations and tests determine whether the applicant for an operator’s license has learned to operate a facility completely and safely, and additionally, in the case of a senior operator, whether the applicant has learned to direct the licensed activities of licensed operators completely and safely.
- The applicant was part of a group of licensed operator candidates from VCSNS 2&3 who passed a written examination and operating test at that facility. The NRC issued the applicant a pass letter providing the results of the initial written examination and operating test. The applicant, now employed by VEGP 3&4, is requesting to have his/her pass letter transferred from VCSNS 2&3 to VEGP 3&4 without taking another written examination and operating test at VEGP 3&4, in accordance with the exemption from the requirement in 10 CFR 55.33(a)(2) that was granted.
- The AP1000 is designed to be a standard plant. VCSNS 2&3 and VEGP 3&4 are of similar age and power level, and share the same vendor and similar design. The exams administered at VCSNS 2&3 and VEGP 3&4 tested common AP1000 systems; the exams did not test systems which are unique to one facility. Due to design standardization, as well as collaboration between VCSNS 2&3 and VEGP 3&4 during exam development, no gaps in the material tested have been identified.
- The VEGP 3&4 operations training group has performed training for prior VCSNS 2&3 personnel on SNC administrative and emergency planning procedures, to address any gaps in these site-specific areas, although this material is outside the scope of the exam.

Item c.4—Other, Item d, Date Passed GFE

WAIVER: A waiver is requested from the requirement of NUREG 1021, ES-202.C.1.b, to complete the GFE 'within 24 months before the date of application.' Pursuant to ES-204.D.1.k(4), the regional office may waive this requirement if the applicant has been a “full” participant in the licensed operator requalification program, including satisfactory performance on the operator or senior operator annual and biennial requalification examinations. The

participation must be continuous from 24 months following the date of the successful completion of the GFE exam up to entrance into the associated initial license class.

The applicant meets the criteria for a waiver of ES-204.D.1.k(4). Following completion of the licensing examination, the candidate was enrolled in a licensed operator continuing training program at VCSNS 2&3. Once hired by VEGP 3&4, the candidate was enrolled in a licensed operator continuing training program at that facility. The SAT-based continuing training programs at VCSNS 2&3 and VEGP 3&4 are functionally equivalent.

The candidate completed the GFE on the date provided in Item 12.d.

BLOCK 20 - Power Reactor Operator Training Program

Item b – Is A “Plant-Referenced Simulator” (As Defined In 10 Cfr 55.4) Used in the Operator Training Program

- **EXPLANATION:**
 - In its Safety Evaluation (SE), the Commission approved the simulation facility at VEGP 3&4 for use in administering operating tests (ML16068A043, March 25, 2016). In an exemption issued by the NRC, the NRC found the simulation facility to be acceptable for conducting control manipulations (ML16090A176, March 31, 2016). Similarly, the Commission approved the simulation facility at VCSNS 2&3 for use in administering operating tests and conducting control manipulations (ML16146A772, July 29, 2016).
 - All Commission-approved simulation facilities used at VEGP 3&4 and VCSNS 2&3 were designed by WEC. Minor differences between the simulation facilities were identified during a gap analysis conducted at VEGP. VCSNS used the original WEC design where VEGP made minor tuning and system response related changes. The gap analysis concluded that differences between the simulation facilities would not have affected operator responses or decision making. Therefore, gap training for prior VCSNS 2&3 operator candidates was not deemed necessary.
 - Continuing training for operator candidates at VEGP 3&4 is conducted using the Commission-approved simulation facility, as needed.

BLOCK 21 – Training

Item a.3 Plant Procedures

- Training on the site Emergency Plan Implementing Procedure (EPIP) was delivered to former VCSNS candidates.
- The candidate self-studied conduct of operations procedures. The candidate completed procedure gap training and passed written examinations covering topics within the procedures.

Item d – Extra Person On Shift in Control Room

- **EXPLANATION:** This item is not applicable to Cold License SRO applicants.

- NUREG-1021, "Operator Licensing Examination Standards for Power Reactors."
 - ES-202.D.2.b(1) states that "before being assigned SRO duties, the applicant should complete at least 3 months as an extra person on shift in training for the SRO position." However,
 - ES-202.D.4 states "Current regulatory guidance does not address the situation in which the plant is not operational (i.e., under construction). Cold licensing examinations are administered prior to fuel load and prior to completion of pre-operational testing and the initial startup test program as described in the FSAR. Each cold license applicant must meet the education, experience, and training guidance described in NEI 06-13A, "Template for an Industry Training Program Description," Revision 1. NEI 06-13A was accepted by the NRC on December 5, 2008 for use in combined operating license applications for proposed new plants."
 - The requirements of NEI 06-13A, Revision 2 were fully incorporated into the VEGP 3&4 UFSAR as Section 13.2A.
- VEGP 3&4 UFSAR, Section 13.2A, "Cold License Training Plan," Table 13.2A-201, Item #8, provides alternative guidance that an SRO applicant meet cumulative operating crew experience requirements and complete a plant observation activity.
- The applicant meets the alternative requirements.

Item e - Time on Shift Above 20% Power

- **EXPLANATION:** This item is not applicable to Cold License applicants.
 - NUREG-1021, "Operator Licensing Examination Standards for Power Reactors."
 - ES-202.D.2.a (3) states in part that an SRO applicant should participate in reactor operator activities at power levels greater than 20 percent for at least 6 weeks. However,
 - ES-202.D.4 states "Current regulatory guidance does not address the situation in which the plant is not operational (i.e., under construction). Cold licensing examinations are administered prior to fuel load and prior to completion of pre-operational testing and the initial startup test program as described in the FSAR. Each cold license applicant must meet the education, experience, and training guidance described in NEI 06-13A, "Template for an Industry Training Program Description," Revision 1. NEI 06-13A was accepted by the NRC on December 5, 2008 for use in combined operating license applications for proposed new plants."
 - The requirements of NEI 06-13A, Revision 2 were fully incorporated into the VEGP 3&4 UFSAR as Section 13.2A.
 - VEGP 3&4 UFSAR, Section 13.2A, "Cold License Training Plan," Table 13.2A-201, Item #8, provides alternative guidance that SRO applicants meet cumulative operating crew experience requirements and complete a plant observation activity.
 - The applicant meets the alternative requirements.

Item g. Other / Continuing Training Program

- The applicant has been enrolled in a Systematic Approach to Training (SAT) based continuing training program that evaluates skills and knowledge continuously since joining Vogtle 3&4.
- The facility licensee commits to enrolling each applicant who passes the NRC Exam into a Systematic Approach to Training (SAT) based continuing training program that evaluates skills and knowledge.

BLOCK 22 - SIGNIFICANT CONTROL MANIPULATIONS

- As stated in the comment section for Block 20 above, the Commission issued an exemption which allowed applicants at VCSNS 2&3 to use the simulation facility for conducting control manipulations.
- Commission-approved simulation facilities used at VEGP 3&4 and VCSNS 2&3 were designed by WEC. Minor differences between the simulation facilities were identified during a gap analysis conducted at VEGP. VCSNS used the original WEC design where VEGP made minor tuning and system response related changes. The gap analysis concluded that differences between the simulation facilities would not have affected operator responses or decision making. Therefore, repeating significant control manipulations for prior VCSNS 2&3 operator candidates was not deemed necessary.
- The applicant performed five control manipulations while employed at VCSNS 2&3. Information regarding the control manipulations can be found in the following table.

Date	Time	Location	Position	Δ Power	Δ Rods	Δ Boron	Δ Tavg
7/16/16	1432	Simulator	OATC	-63.9%	-17 steps	-8 ppm	-6.4°F
Method: Turbine trip without reactor trip, manual rod control, rod drops							
Criteria: 10 CFR 55.59 (c)(3)(i)(R), Mispositioned control rod or rods (or rod drops)							

PERSONALLY IDENTIFIABLE INFORMATION - WITHHOLD UNDER 10 CFR 2.390

NRC FORM 398

(10-2017)

10 CFR 55.31, 55.33,
55.35, 55.47, 55.53,
and 55.57.

U.S. NUCLEAR REGULATORY COMMISSION

PERSONAL
QUALIFICATION
STATEMENT -- LICENSEE

APPROVED BY OMB: NO. 3150-0090

EXPIRES: 03/31/2019

DATE RECEIVED

(To be completed by NRC)

Estimated burden per response to comply with this mandatory collection request: 2.56 hours. NRC requires this information to ensure that applicants/licensees meet all the requirements for taking reactor operator examinations. Send comments regarding burden estimate to the Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0090), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. Last Name XXX		2. First Name XXX		3. Middle Initial X	4. Birth Date: (MM/DD/YYYY) XXX	5. E-mail Address XX			
6. Address (Number & Street, line 1) XXXXXX		7. Address (Suite, Unit No, etc., line 2)		8. City Augusta		9. State GA		10. Zip Code XXXXX	
11. Type of Application (Check applicable boxes)				12. Deferrals/Excusals/Waivers (check all that apply and justify in item 25)					
<input checked="" type="checkbox"/> A. NEW		<input type="checkbox"/> E. REAPPLICATION		<input checked="" type="checkbox"/> a. DEFERRAL		<input type="checkbox"/> b. EXCUSAL		<input checked="" type="checkbox"/> c. WAIVER	
<input type="checkbox"/> B. RENEWAL		<input type="checkbox"/> 1 - FIRST DENIAL		<input checked="" type="checkbox"/> 1 - ELIGIBILITY		<input type="checkbox"/> 1 - WRITTEN (Category)		<input checked="" type="checkbox"/> 1 - WRITTEN (Category) SSS	
<input type="checkbox"/> C. UPGRADE		<input type="checkbox"/> 2 - SECOND DENIAL		<input type="checkbox"/> 2 - EXPERIENCE		<input type="checkbox"/> 2 - OPERATING (Category)		<input checked="" type="checkbox"/> 2 - OPERATING (Category) OPT	
<input type="checkbox"/> D. MULTI-UNIT (amend to include additional unit)		<input type="checkbox"/> 3 - THIRD DENIAL		<input checked="" type="checkbox"/> d. DATE PASSED GFE		<input type="checkbox"/> 3 - MEDICAL			
		<input type="checkbox"/> 4 - WITHDRAWAL		(MM) September (09)		(YY) 13		<input checked="" type="checkbox"/> 4 - OTHER GFE	
13. Type of License Applied for: <input type="checkbox"/> OPERATOR (RO) <input checked="" type="checkbox"/> SENIOR OPERATOR (SRO) <input type="checkbox"/> LIMITED (LSRO)									
14. Current or Previous License(s) Held									
Docket Number 055 - XXXX		<input type="checkbox"/> RO <input type="checkbox"/> LSRO <input checked="" type="checkbox"/> SRO		License Number(s)		Expiration Date(s)		Facility Docket Number(s) <input type="checkbox"/> 050 <input type="checkbox"/> 052	
15. Name of Applicant's Facility Vogtle Electric Generating Plant		<input type="checkbox"/> 050 <input checked="" type="checkbox"/> 052		16. Facility Docket Number 052-025		17. Additional Facility Docket Number(s) (Multi-unit Licenses)			
18. Current Position at Facility									
<input type="checkbox"/> A. Plant Supervisor/Manager			<input type="checkbox"/> E. Shift Technical Advisor/Shift Engineer			<input checked="" type="checkbox"/> I. Trainee			
<input type="checkbox"/> B. Assistant Plant Superintendent/Manager			<input type="checkbox"/> F. Instructor			<input type="checkbox"/> J. Non-Licensed Operator			
<input type="checkbox"/> C. Shift Supervisor			<input type="checkbox"/> G. Senior Control Room Operator			<input type="checkbox"/> K. Other (Specify in block 25)			
<input type="checkbox"/> D. Staff Engineer			<input type="checkbox"/> H. Control Room Operator						
19. Education									
a. High School		b. College		DEGREE CODES ("Highest Degree" obtained) 0 - None 1 - Certificate 2 - Associate 3 - Bachelor 4 - Master 5 - Doctoral		c. Vocational/Technical		Number of Months	Certificate Received
<input checked="" type="checkbox"/> Graduate		Major Area(s) of Study		HIGHEST DEGREE (Use Codes)		Type of Training			
<input type="checkbox"/> GED Equivalency		ENGINEERING		2 - 5					<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> No		OTHER		1 - 2					<input type="checkbox"/> Yes <input type="checkbox"/> No
20. Power Reactor Operator Training Program									
a. Has the applicant completed the Operator Training Program accredited by the National Nuclear Accrediting Board?								<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
b. Is a "Plant-Referenced Simulator" (As defined in 10 CFR 55.4) used in the Operator Training Program?								<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
21. Training (Since Last Application - See Instructions)									
a. Classroom		From (MM/YYYY)	To (MM/YYYY)	No. of Weeks	d. Extra Person on Shift in Control Room		From (MM/YYYY)	To (MM/YYYY)	No. of Weeks
1 - Nuclear Power Plant Fundamentals					e. Time on Shift Above 20% Power				
2 - Plant Systems					f. Requalification				
3 - Plant Procedures		05/2018	05/2018		g. Other (Specify below)				
b. Simulator					Continuing Training Program		10/2017	7/2018	4
c. SRO Instruction									
22. Significant Control Manipulations									
DESCRIPTION		PLANT	SIMULATOR	DESCRIPTION		PLANT	SIMULATOR		
a.	See attached (Block 25)	<input type="checkbox"/>	<input type="checkbox"/>	f.		<input type="checkbox"/>	<input type="checkbox"/>		
b.		<input type="checkbox"/>	<input type="checkbox"/>	g.		<input type="checkbox"/>	<input type="checkbox"/>		
c.		<input type="checkbox"/>	<input type="checkbox"/>	h.		<input type="checkbox"/>	<input type="checkbox"/>		
d.		<input type="checkbox"/>	<input type="checkbox"/>	i.		<input type="checkbox"/>	<input type="checkbox"/>		
e.		<input type="checkbox"/>	<input type="checkbox"/>	j.		<input type="checkbox"/>	<input type="checkbox"/>		

PERSONAL QUALIFICATION STATEMENT -- LICENSEE (Continued)

1. Last Name	2. First Name	3. Middle Initial	Docket Number
XXX	XXX	X	055 - XXXX

23. Nuclear Experience Details

POSITION TITLE	FROM DATE	TO DATE	MONTHS	FACILITY	DUTIES
Sr. Reactor Operator, from Sr. Auxiliary Operator	09/2012	09/2017	60	VC Summer Nuclear Station, Units 2 & 3	Initial License Class, Procedure Writing & Reviews, Training Material Reviews.
Engineer II (Qualified FAC), from Engineer III	01/2010	09/2012	32	Brunswick Nuclear Plant, Units 1 & 2	FAC Program Engineer Lead intern program 2yrs Assisted MR, PMs, SysEng Wrote VBA/DBs
(Part time) Temporary Student Worker, from (Full time) Nuclear Eng. Intern	05/2009	1/2010	3	Crystal River Nuclear, Unit 3	Developed VBA/DBs for HU inc. Site Observation, Sim Performance, Trng Matl, & Whse DBs.

24. For Renewals Only

a. Hours Operated Facility	<input type="checkbox"/> < 100 (LESS THAN)	b. Date and result of last written comprehensive requalification exam and annual operating test.	Date		Result	
	<input type="checkbox"/> 100 - 1000		W		<input type="checkbox"/> PASS	<input type="checkbox"/> FAIL
	<input type="checkbox"/> > 1000 (MORE THAN)		O		<input type="checkbox"/> PASS	<input type="checkbox"/> FAIL

25. Comments

See attached.

26. NRC FORM 396, CERTIFICATION OF MEDICAL EXAMINATION BY A FACILITY LICENSEE, IS ATTACHED

☒ Yes

☐ No

PERSONAL QUALIFICATION STATEMENT -- LICENSEE (Continued)

1. Last Name	2. First Name	3. Middle Initial	Docket Number
XXX	XXX	X	055 - XXXX

27. Signatures

ANY FALSE STATEMENT OR OMISSION IN THIS DOCUMENT, INCLUDING ATTACHMENTS, MAY BE SUBJECT TO CIVIL AND CRIMINAL SANCTIONS.

27a. I certify under penalty of perjury that the information in this document and attachments is true and correct in accordance with the instructions. I also authorize the NRC to submit the results of examinations to my employers for use in preparing retraining programs, as necessary.

Signature - Applicant	Date
-----------------------	------

☐ **Electronic Correspondence Option:** By checking this box, you are acknowledging that the NRC will be providing operator licensing correspondence electronically.

27b. CHECK APPLICABLE BOX(ES) FOR TYPE OF APPLICATION (i.e., check 1 if item 11 a, c, d, or e is checked; check 2 if item 11 b is checked; and check 3 if item 12 a, b, or c is checked.)

☐ 1. I certify that: (1) the above named individual has successfully completed the facility licensee's requirements to be licensed as an Operator/Senior Operator pursuant to Title 10, Code of Federal Regulations, Part 55; (2) the individual has a need for an Operator/Senior Operator license to perform his/her assigned duties; and (3) the facility will be made available for the examination. I also certify under penalty of perjury that the information in this document and attachments is true and correct in accordance with the instructions.

☐ 2. I certify that the above named individual completed the approved requalification program (with the exceptions noted in Item 25) required by section 50.54(i-1) of 10 CFR 50, and that he/she has discharged his/her licensed responsibilities competently and safely. I also certify under penalty of perjury that the information in this document and attachments is true and correct.

☐ 3. I certify that the justifications provided in item 25 support the deferrals, excusals, and/or waivers requested in item 12 for the above named individual. I also certify under penalty of perjury that the information in this document and attachments is true and correct in accordance with the instructions.

TRAINING COORDINATOR

Typed or Printed Name and Title (Training Coordinator)

Signature (Training Coordinator)	Date
----------------------------------	------

SENIOR MANAGEMENT REPRESENTATIVE ON SITE

Typed or Printed Name and Title (Senior Management Representative on Site)

Signature (Senior Management Representative on Site)	Date
--	------

FOR NRC USE

Deferral/Excusal/Waiver Requests (Check or Complete items, as applicable)		GRANTED BY		DENIED BY	
		HEADQUARTERS	REGION	HEADQUARTERS	REGION
Deferral	Eligibility				
	Experience				
Excusal	Written				
	Operating				
Waiver	Written				
	Operating				
	Medical				
	Other				

Explanation:

☐ MEETS REQUIREMENTS ☐ DOES NOT MEET REQUIREMENTS

Signature	Date
-----------	------

PERSONAL QUALIFICATION STATEMENT -- LICENSEE (INSTRUCTIONS)

You must complete items 1-11, 19, and 20, plus changes since your last application, and other items as specified below. For additional guidance refer to NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," or NUREG-1478, "Non-Power Reactor Operator Licensing Examiner Standards."

11. TYPE OF APPLICATION

A. NEW - "X" if you are a new applicant at this facility (i.e., this is your first request to take the site-specific NRC exam at this facility). Complete items 13, 18-23 (10 CFR 55.31).
B. RENEWAL - "X" if you are renewing a current license. Complete items 20, 21.f and 23 (10 CFR 55.57); if items 20.a and 20.b are checked "YES" then item 21.f does not have to be completed.
C. UPGRADE - "X" if you hold an RO license and are applying to upgrade your license to an SRO at the same facility. Complete items 20, 21 and 23 relevant to the SRO upgrade.
D. MULTI-UNIT - "X" if you hold a license at your facility and are applying to amend your current license to an additional unit. Complete item 21 as it applies to unit differences.
E. REAPPLICATION - "X" if you have previously been denied a license. Indicate whether you are applying after a first denial, second denial, or third denial. Describe, in detail, in items 21 and 25, the additional training completed since the last denial (10 CFR 55.35). If you previously withdrew an application, check item 11.E.4 and complete items 19-23.

12. GFE and Excusals/Deferrals/Waivers - Refer to NUREG-1021 or NUREG-1478 for additional guidance.

a. Deferral - "X" if you are requesting a deferral of certain requirements to be able to sit for the scheduled NRC exam. Check which requirements (1 - Eligibility or 2 - Experience) you are requesting deferral of. Indicate the expected completion time for these requirements in item 25.
b. Excusal - "X" if you are requesting to have a previously passed portion of the NRC exam excused (10 CFR 55.35(b)). Indicate which requirements of the requested portion you are requesting excusal from (1 - Written or 2 - Operating), and indicate the category.

For Power Reactors:

For written exam excusals, check box 12.b.1 and enter a category of "SSR" for the site-specific RO exam or "SSS" for the site-specific RO and SRO exams. For operating test excusals, check box 12.b.2 and enter a category of "SIM" for simulator operating test ONLY, "JPM" for the complete JPM operating test ONLY, SYS for the systems portion of the JPM operating test ONLY (i.e., for an "Admin-only" JPM retake exam), or OPT to request excusal from both the simulator operating test and the complete JPM operating test. Provide justification in item 25. Also indicate the expected date of the NRC exam.

For Non-Power Reactors:

For written exam excusals, check box 12.b.1 and enter a category of "A: to request an excusal of category A, enter a category of "B" to request an excusal of category B, enter a category of "C" to request an excusal of category C. For operating test excusals, check box 12.b.2 and enter a category of "ALL" to request excusal of an operating test. Individual categories will not be excused.

c. Waiver - "X" if you are requesting a waiver. For waivers of the written examination and/or operating test, check 12.c.1 and/or 12.c.2 respectively and identify the examination categories using the same designations identified in the instructions for 12.b above. For medical waivers, check 12.c.3. For GFE waivers, check 12.c.4. For all waivers, provide additional justification information in item 25.
d. Date passed GFE - This is not applicable to research and test reactors, licenses limited to fuel handling (LSRO), renewal or upgrade applications (items 11.b and 11.c). Enter month and year you passed GFE for the type of facility (BWR/PWR) identified in item 15. If this date is more than two years prior to the date of your application, item 12.c.4 must be checked, and the method used to justify the GFE waiver must be described in item 25.

19. EDUCATION - For college, enter the major area(s) of study, the number of years spent in each major area of study and the highest degree obtained (using degree codes listed on the form). For vocational/technical, enter the number of months for each type of training and whether a certificate was awarded. If additional space is needed, use item 25.

20. POWER REACTOR OPERATOR TRAINING PROGRAM - Check the appropriate box in items 20.a and 20.b.

Checking "YES" in item 20.a indicates that you have completed a SAT-based training program that is accredited by the National Nuclear Accrediting Board and meets the education and experience requirements outlined in the National Academy for Nuclear Training in its current guidelines for initial training and qualification of licensed operators. If "YES" is checked in both items 20.a and 20.b, then items 21 and 23 do not have to be completed with the following exceptions: (1) certified instructors seeking an SRO license must complete item 23; (2) any exceptions, deferrals, or waivers from the education and experience requirements outlined by the National Academy for Nuclear Training must be explained in item 25.

21. TRAINING - All requalification training time is to be accounted for in item 21.f (unless items 20.a and 20. b are checked "YES"). Do not "double list" the time spent in requalification training for classroom or simulator time under items 21.a or 21.b.

22. SIGNIFICANT CONTROL MANIPULATIONS - If you are a NEW applicant (item 11.a), you must provide evidence that you have successfully manipulated the controls of the facility for which a license is sought. Describe (date, time, type, and magnitude) at least five significant control manipulations that affect reactivity or power level and whether the manipulations were performed in the plant or on the simulator (10 CFR 55.31(a)(5), 10 CFR 55.46(c)). If needed, use item 25 or attach information.

23. EXPERIENCE DETAILS - For each position held, provide position title, time in position (from/to and number of months), facility, and a description of duties performed while in that position. Do not double count time. If you had overlapping duties, the time should reflect the amount of time you were assigned to those particular duties. In no case should the number of months reported exceed the number of months that are in that time period. If more space is needed, use item 25 or attach additional information.

24. FOR RENEWALS ONLY - (a) Check the box that most accurately reflects your approximate number of operating hours since previous renewal or issuance of license if first renewal. (b) Enter the date and results of your most recent comprehensive written requalification examination and annual operating test (10 CFR 55.57).

25. COMMENTS - Use this space to include any extra information or clarification for other items on the application form. If the space provided is not sufficient, you may attach extra information with your application.

26. NRC FORM 396, CERTIFICATION OF MEDICAL EXAMINATION BY FACILITY LICENSEE, IS ATTACHED - NRC Form 396 must accompany this application unless a waiver of the medical examination is being requested in item 12.c.3 (10 CFR 55.23).

PERSONAL QUALIFICATION STATEMENT -- LICENSEE (INSTRUCTIONS)(continued)

27. SIGNATURES - You must sign and date item 27a. If you prefer to check the Electronic Correspondence Option, you will be authorizing the NRC to forego receiving paper documents and receiving your operator license related correspondence using the Electronic Information Exchange. The NRC will automatically create a digital certificate for you to allow you to access your documents from a secure location for quicker access to your documents. If you do not check this box, the NRC will provide your correspondence using ground mail. Obtain signatures of your training coordinator and the senior management representative on site.

ADDRESSES

In accordance with 10 CFR 55.5, Communications, this form shall be submitted to the appropriate NRC office. Where practicable, submission shall be electronic; examples include via Electronic Information Exchange or CD-ROM. Electronic submissions must be made in a manner that enables the NRC to receive, read, authenticate, distribute, and archive the submission, and process and retrieve it a single page at a time. Detailed guidance on making electronic submissions can be obtained by visiting the NRC's Web site at <http://www.nrc.gov/site-help/e-submittals.html>; by e-mail to MSHD.Resource@nrc.gov; or by writing the Office of the Chief Information Officer, U.S. Nuclear Regulatory Commission, Washington, DC 20555 -0001.

This form may also be submitted by mail, addressed to:

**REGIONAL ADMINISTRATOR, REGION I
U.S. NUCLEAR REGULATORY COMMISSION
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713**

**REGIONAL ADMINISTRATOR, REGION III
U.S. NUCLEAR REGULATORY COMMISSION
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352**

**REGIONAL ADMINISTRATOR, REGION II
U.S. NUCLEAR REGULATORY COMMISSION
245 PEACHTREE CENTER AVENUE, NE., SUITE 1200
ATLANTA, GA 30303-1257**

**REGIONAL ADMINISTRATOR, REGION IV
U.S. NUCLEAR REGULATORY COMMISSION
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511**

**U.S. NUCLEAR REGULATORY COMMISSION
RESEARCH AND TEST REACTORS
OVERSIGHT BRANCH
OFFICE OF NUCLEAR REACTOR REGULATION
WASHINGTON, DC 20555-0001**

**PRIVACY ACT STATEMENT
NRC FORM 398
PERSONAL QUALIFICATION STATEMENT LICENSEE**

Pursuant to 5 U.S.C. 552(e)(3), enacted into law by Section 3 of the Privacy Act of 1974 (Public Law 93-579), the following statement is furnished to individuals who supply information to the Nuclear Regulatory Commission (NRC) on NRC Form 398. This information is maintained as part of a system of records designated as NRC-16, described at 81 FR 81331(November 17, 2016), or the most recent *Federal Register* publication of the NRC's "Republication of Systems of Records Notices" that is located in NRC's Agencywide Documents Access and Management System (ADAMS).

1. AUTHORITY: 42 U.S.C. 2131-2141; 10 CFR Part 55.

2. PRINCIPAL PURPOSE(S): To ensure that applicants/licensees meet all the requirements for taking reactor operator examinations.

3. ROUTINE USE(S): Information may be used to determine if the individual meets the requirements of 10 CFR part 55 to take an examination or to be issued an operators license; to provide researchers with information for reports and statistical evaluations related to selection, training, and examination of facility operators; to provide examination, testing material, and results to facility management. Information may be disclosed to an appropriate Federal, State, local or Foreign agency in the event the information indicates a violation or potential violation of law; in the course of an administrative or judicial proceeding; to an appropriate Federal, State, local and foreign agency to the extent relevant and necessary for an NRC decision about you; in the course of discovery under a protective order issued by a court of competent jurisdiction, and in presenting evidence; to a Congressional office to respond to their inquiry made at your request; to NRC-paid experts, consultants, and others under contract with the NRC, on a need-to-know basis; or to appropriate persons and entities for purposes of response and remedial efforts in the event of a suspected or confirmed breach of data from this system of records.

4. WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL OF NOT PROVIDING INFORMATION: Disclosing this information is voluntary. However, if the information requested is not provided, NRC will not be able to evaluate whether the applicant meets the requirements of 10 CFR Part 55.

5. SYSTEM MANAGER(S) AND ADDRESS: Chief, Operator Licensing and Training Branch, Division of Inspection and Regional Support, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.