



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

June 18, 2019

Mr. Dean Curtland
Director of Site Operations
NextEra Energy Duane Arnold, LLC
3277 DAEC Road
Palo, IA 52324-9785

**SUBJECT: DUANE ARNOLD ENERGY CENTER—NRC INITIAL LICENSE EXAMINATION
REPORT 05000331/2019301**

Dear Mr. Curtland:

On April 26, 2019, the U.S. Nuclear Regulatory Commission (NRC) completed the initial operator licensing examination process for license applicants employed at your Duane Arnold Energy Center. The enclosed report documents the results of those examinations. Preliminary observations noted during the examination process were discussed on April 12, 2019, with you and other members of your staff. An exit meeting was conducted by telephone on May 10, 2019, between Mr. C. Hill of your staff, and Mr. C. Zoia, Senior Operator Licensing Examiner, to review the proposed final grading of the written examination for the license applicants. During the telephone conversation, NRC resolutions of the station's post-examination comments, received by the NRC on April 26, 2019, were discussed.

The NRC examiners administered an initial license examination operating test during the week of April 8, 2019. The written examination was administered by Duane Arnold Energy Center training department personnel on April 16, 2019. Five Senior Reactor Operator and four Reactor Operator applicants were administered license examinations. The results of the examinations were finalized on May 16, 2019. Eight applicants passed all sections of their respective examinations; four applicants were issued a senior operator license and three applicants were issued an operator license. One applicant failed one or more sections of the administered examination and was issued a preliminary results letter. In accordance with NRC policy, the license for the remaining applicant will be issued upon resolution of deferred items.

The written examination and other related examination documentation will not be withheld from public disclosure per your request.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations*, Part 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Rhex A. Edwards, Acting Chief
Operations Branch
Division of Reactor Safety

Docket No. 50-331
License No. DPR-49

Enclosures:

1. OL Examination Report 05000331/2019301
2. Post-Examination Comment, Evaluation,
and Resolution
3. Simulation Facility Fidelity Report

cc: Distribution via LISTSERV®
C. Hill, Training Manager, Duane Arnold
Energy Center

Letter to Dean Curtland from Rhex A. Edwards dated June 18, 2019.

SUBJECT: DUANE ARNOLD ENERGY CENTER—NRC INITIAL LICENSE EXAMINATION
REPORT 05000331/2019301

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-331

License No: DPR-49

Report No: 05000331/2019301

Enterprise Identifier: L-2018-OLL-0002

Licensee: NextEra Energy Duane Arnold, LLC

Facility: Duane Arnold Energy Center

Location: Palo, IA

Dates: April 8, 2019, through April 26, 2019

Inspectors: C. Zoia, Senior Operations Engineer, Chief Examiner
J. DeMarshall, Senior Operations Engineer, Examiner
B. Litkett, Reactor Engineer, Examiner

Approved By: R. Edwards, Acting Chief
Operations Branch
Division of Reactor Safety

SUMMARY

Examination Report 05000331/2019301; 04/08/2019-04/26/2019; NextEra Energy Duane Arnold, LLC; Duane Arnold Energy Center; Initial License Examination Report.

The announced initial operator licensing examination was conducted by U.S. Nuclear Regulatory Commission examiners in accordance with the guidance of NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 11.

Examination Summary

Eight of nine applicants passed all sections of their respective examinations. Four applicants were issued senior operator licenses and three applicants were issued operator licenses. One applicant failed one or more sections of the administered examination and was issued a preliminary results letter. In accordance with NRC policy, the license for the remaining applicant will be issued following certification by the facility that all of the deferred experience requirement elements are complete. (Section 4OA5.1).

REPORT DETAILS

4OA5 Other Activities

.1 Initial Licensing Examinations

a. Examination Scope

The U.S. Nuclear Regulatory Commission (NRC) examiners and members of the facility licensee's staff used the guidance prescribed in NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 11, to develop, validate, administer, and grade the written examination and operating test. The written examination outlines were developed by the NRC staff and were transmitted to the facility licensee's staff. Members of the facility licensee's staff prepared the operating test outlines and developed the written examination and operating test. The NRC examiners validated the proposed examination during the week of March 11, 2019, with the assistance of members of the facility licensee's staff. During the on-site validation week, the examiners audited two license applications for accuracy. The NRC examiners, with the assistance of members of the facility licensee's staff, administered the operating test, consisting of Job Performance Measures and dynamic simulator scenarios, during the week of April 8, 2019. The facility licensee administered the written examination on April 16, 2019.

b. Findings

(1) Written Examination

The NRC examiners determined that the written examination, as proposed by the licensee, was within the range of acceptability expected for a proposed examination. Less than 20 percent of the proposed examination questions were determined to be unsatisfactory and required modification or replacement.

During the validation of the written examination, several questions were modified or replaced. All changes made to the written examination were made in accordance with NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," and documented on Form ES-401-9, "Written Examination Review Worksheet." The Form ES-401-9, the written examination outlines (ES-401-2 and ES-401-3), and both the proposed and final written examinations, will be available electronically in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS), with no exam files to be temporarily withheld from public disclosure per your request (ADAMS Accession Numbers ML17214A866, ML17214A864, ML17214A865, and ML17214A863, respectively).

On April 19, 2019, and April 26, 2019, the licensee submitted documentation noting that there were three post-examination comments for consideration by the NRC examiners when grading the written examination. The post-examination comments and the NRC resolution for the post-examination comments are documented in Enclosure 2 to this report.

The NRC examiners graded the written examination on April 23, 2019, and conducted a review of each missed question to determine the accuracy and validity of the examination questions.

(2) Operating Test

The NRC examiners determined that the operating test, as originally proposed by the licensee, was within the range of acceptability expected for a proposed examination.

Following the review and validation of the operating test, minor modifications were made to several Job Performance Measures, and some minor modifications were made to the dynamic simulator scenarios. All changes made to the operating test were made in accordance with NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," and were documented on Form ES-301-7, "Operating Test Review Worksheet." The Form ES-301-7, the operating test outlines (ES-301-1, ES-301-2, and ES-D-1s), and both the proposed and final operating tests, will be available electronically in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS, with no exam files to be temporarily withheld from public disclosure per your request (ADAMS Accession Numbers ML17214A866, ML17214A864, ML17214A865, and ML17214A863, respectively).

The NRC examiners completed operating test grading on May 16, 2019.

(3) Examination Results

Five applicants at the Senior Reactor Operator level and four applicants at the Reactor Operator level were administered written examinations and operating tests. The results of the examinations were finalized on May 16, 2019. Eight applicants passed all sections of their respective examinations; four applicants were issued a senior operator license and three applicants were issued an operator license. One applicant failed one or more sections of the administered examination and was issued a preliminary results letter. In accordance with NRC policy, the license for the remaining applicant will be issued following certification by the facility that all of the deferred experience requirement elements are complete.

.2 Examination Security

a. Scope

The NRC examiners reviewed and observed the licensee's implementation of examination security requirements during the examination validation and administration to assure compliance with Title 10 of the *Code of Federal Regulations*, Part 55.49, "Integrity of Examinations and Tests." The examiners used the guidelines provided in NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," to determine acceptability of the licensee's examination security activities.

b. Findings

None.

4OA6 Management Meetings

.1 Debrief

The chief examiner presented the examination team's preliminary observations and findings on April 12, 2019, to Mr. D. Curtland, Director of Site Operations, and other members of the Duane Arnold Energy Center staff.

.2 Exit Meeting

The chief examiner conducted an exit meeting on May 10, 2019, with Mr. C. Hill, Training Manager, and other members of the Duane Arnold Energy Center staff, by telephone. The NRC's final disposition of the station's post-examination comments were disclosed and discussed. The examiners asked the licensee whether any of the material used to develop or administer the examination should be considered proprietary. No proprietary or sensitive information was identified during the examination or debrief/exit meetings.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

D. Curtland, Site Director
J. M. Davis, Nuclear Licensing Manager
C. Hill, Training Manager
P. Hanson, Nuclear Engineering Site Director
J. Miell, Operations Work Control Center Manager
J. Ford, Operations Training Supervisor
M. Walter, Operations Training Supervisor
E. Murray, Operations Training Supervisor
S. Anderson, Senior Operations Instructor
S. Arebaugh, Shift Manager
M. Strobe, Operations Director

U.S. Nuclear Regulatory Commission

C. Zoia, Chief Examiner
J. DeMarshall, Examiner
B. Litkett, Examiner

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened, Closed, Discussed

None

LIST OF ACRONYMS USED

ADAMS	Agencywide Document Access and Management System
ECCS	Emergency Core Cooling Systems
NRC	U.S. Nuclear Regulatory Commission
RPS	Reactor Protection System
SRM	Source Range Monitor

POST-EXAMINATION COMMENT, EVALUATION, AND RESOLUTION

Question No. 10

The MODE switch is in REFUEL with the vessel head removed.

The following SRM indications are noted:

	Period	CPS
SRM A	∞	1E3
SRM B	∞	1E3
SRM C	+10 (steady)	2E4
SRM D	+100 (steady)	5E5

What signals are automatically generated by the SRMs, if any?

- A. Rod Block only
- B. Half Scram and Rod Block
- C. Full Scram and Rod Block
- D. No automatic signals are generated

Answer: A

Reference: System Description 358

Applicant Comment: The question asked about SRM signals. 5×10^5 is a SCRAM signal and only 1 SRM is required for SCRAM. 1×10^5 is a Rod Block. I think C is right because the question does not specify shorting links. Question does not specify if shorting links are installed.

Facility Position on Applicant Comment: ("No Action Required" was indicated); the configuration of the RPS shorting links has remained unchanged from initial criticality. Removing the shorting links would not be a viable configuration for current plant config. No change required.

NRC Evaluation/Resolution: The question asked the applicant to determine which of the signals were automatically generated for the given conditions, and as the applicant noted, the condition of the shorting links was not specified. Source Range Monitor (SRM) channel upscale neutron flux level trip was only used during initial fuel loading and low power physics testing to provide reactor protection until overlap between the SRMs and Intermediate Range Monitors was demonstrated. With Reactor Protection System (RPS) shorting links installed, the RPS Scram function is disabled. The facility stated that the condition of the shorting links has not changed following initial criticality when the shorting links were installed, and it was incorrect to make any assumptions about them per NUREG-1021, Appendix E (Part B.7, Written Exam Guidelines). The only signal applicable to the conditions given in the stem was choice A (Rod Block only). Therefore, the U.S. Nuclear Regulatory Commission (NRC) concluded that choice A, as annotated on the answer key, was the only correct answer, and the question was considered acceptable as-administered.

POST-EXAMINATION COMMENT, EVALUATION, AND RESOLUTION

Question No. 28

A Loss of Offsite Power has occurred and RPV Emergency Depressurization is in progress.

- “A” and “B” Core Spray pumps failed to automatically START and will not run
- All remaining Low Pressure Emergency Core Cooling Systems (ECCS) pumps are running on minimum flow
- Reactor pressure is 600 psig and lowering

In accordance with EOP 1, RPV Control, below which reactor pressure will the Balance of Plant Operator first observe reactor water level being to rise?

- A. 450 psig
- B. 330 psig
- C. 260 psig
- D. 135 psig

Answer: C

References: EOP Table 1, Preferred Injection Systems; EOP-1 Bases

Applicant Comment: Question asks when level will first begin to rise from injection of RHR. The RHR system description and the RHR OI both indicate RHR shutoff head of 240 psig. If that is the case then the only possible choice given is D. 135 psig.

Facility Position on Applicant Comment: (“No Action Required” was indicated); the question references EOP-1 limitations. The shutoff head listed in EOP-1 Table for ECCS Injection Systems lists 260 psig.

NRC Evaluation/Resolution: The question specifically asks “below which reactor pressure will the Balance of Plant Operator first observe reactor water level being to rise,” not “when level will first begin to rise from injection of RHR.” The applicant must initially determine which of the Low Pressure ECCS systems will inject first, based upon the given plant conditions. Then, using this information and the discrete pressures given, determine the correct pressure below which the Balance of Plant will first observe reactor water level begin to rise. Additionally, the question specifically asks for an answer “in accordance with EOP 1, RPV Control.” As the facility stated, the value per the Preferred Injection Systems Table 1A for the RHR system, is about 260 psig. The applicant was incorrect in making additional assumptions and using values from other references per NUREG-1021, Appendix E (Part B.7, Written Exam Guidelines). The RHR system will begin injecting significantly before reaching the 135 psig value, which will result in reactor level visibly rising, and therefore, the correct answer is “C. 260 psig.” Therefore, the NRC concluded that choice C, as annotated on the answer key, was the only correct answer, and the question was considered acceptable as-administered.

POST-EXAMINATION COMMENT, EVALUATION, AND RESOLUTION

Question #7

Which of the following work tasks requires a Clearance Order?

- A. Replacing a SBTG train Roughing Filter
- B. Changing fuses in a 250 VDC systems
- C. Changing the Domestic Water Filter
- D. Liquid nitrogen tank delivery/refill

Answer: A

Reference: OP-AA-101-100, Clearance and Tagging, Rev. 24; Attachment 10, General Pre-Approved Work.

Applicant Comments: The question fails to specify configuration control. OI (*procedure*) Sections Govern performing filter changes of Domestic Water filter or Nitrogen Tank Deliveries. No section within OI 388 instructs individuals on changing a fuse nor documents the Lineup requiring checking them in place. A Configuration control clearance would allow the fuse to be returned to normal status as defined by OP-AA-101-1000 page 7, 2.0, 13 Status Control / Configuration Control. In addition, a clearance would provide worker protection when working around energized equipment (near a 250 VDC fuses in some cases). Recommend accepting choice B “Changing 250 VDC Fuses” as another acceptable answer.

Facility Positions on Applicant Comments:

(1) (“Evaluation Change” was noted); attached is a clearance that involved [the applicant] in the tag removal process. You’ll note the work scope included checking and replacing fuses in 1045 which is an inverter supplied by 250 VDC. This shows a direct tie to [the applicant] and a clearance that provided protection for replacing fuses. Fuses have also been replaced for EC7304A and B, 1V-SFU-30A/B ELECTRIC PREHEAT COIL, under a clearance. In regards to question 70 on the LOIT NRC Reactor Operator exam, here (*is*) our view on a possible response that could lead to two correct answers. The exam development team used OP-AA-101-1000 Attachment 10 (Examples of work not requiring a clearance) to aid in development of the question. Step 1.0 (6) states “Changing fuses in systems less than 600 volts, using properly rated fuse pullers.” Distractor B was considered to fit this example and thus would be a plausible distractor. This creates a mental model of a fuse strip in a control panel that has low voltages within it and no other electrical hazards of concern. In fact, the station has 250 VDC fuses located inside panels with hazards severe enough to warrant protection. The clearance process isolates hazards both direct and adjacent. The adjacent hazard is what led us to provide worker protection for the historical clearances referenced. So it is not as simple as Attachment 10 would indicate. Each work activity must be evaluated for the risk to workers and the clearance process applied as needed. The attached clearance shows that [the applicant’s] experience base includes at least one activity related to answer B. In fairness, [the applicant] has experience hanging a clearance for roughing filters on a SBTG train, so answer A should have been on *his/her* mind also. Given (*s*)*he* has seen both in *his/her* career; (*s*)*he* could have been put in a position where (*s*)*he* saw two right answers and was forced to choose one. Perhaps (*s*)*he* chose ‘B’ because the electrical hazard posed the greater threat in *his/her* mind.

POST-EXAMINATION COMMENT, EVALUATION, AND RESOLUTION

In any case, it is the judgment of the station Training and Operations department that there are two right answers to this question. **Also accept Choice B as an acceptable answer.**

(2) The licensee offered the following additional information as an addendum to its original comments with respect to Question 70:

This letter contains additional information to clarify the station's position regarding Reactor Operator Written Examination Question 70 post-examination comments. Question 70 development was focused specifically on information provided in OP-AA-101-1000 "CLEARANCE AND TAGGING, ATTACHMENT 10 EXAMPLES OF WORK NOT REQUIRING A CLEARANCE." The applicable statement from the procedure was: Changing fuses in systems less than 600 volts, using properly rated fuse pullers, is an example of general preapproved work not requiring a clearance. The statement means worker protection from hazardous energy via a clearance order is not required when changing fuses with a 600 volt rated fuse puller in a less than 600 volt system. The statement is specific to the hazardous energy protection provided using the tool (fuse puller). Because the fuse puller provides worker protection based on its rating, worker protection via a separate clearance order is not required for the specific act of pulling the fuse. The statement is not specific to hazardous energy protection based on the worker's proximity to energized components when pulling a fuse, or a workers potential for inadvertent contact with energized components while pulling a fuse. The OP-AA-101-1000 defines Hazardous Energy as: Any form of energy (thermal, electrical, chemical, etc.) that when released unexpectedly could result in personnel injury or equipment damage. There are two critical components to this understanding. First the energy must be of a magnitude that could cause injury to an employee; secondly the release of the energy must be unexpected or could be unexpected. The magnitude of the energy is dependent upon the type and release rate of the energy. If there is any question as to a source of energy being considered hazardous then a conservative position shall be taken and the source of energy will be treated as hazardous and appropriate isolations techniques shall be used (e.g., Danger Tag or Locking Device for personnel protection). The OP-AA-101-1000 defines Potentially Energized Equipment as: Possibility or potential for encountering energized equipment not isolated by a Clearance may exist at any plant location, but is most likely to be encountered within multi-purpose cabinets where equipment not associated with a Clearance is still energized. Employees shall assume that equipment is energized until it is isolated by a Clearance and tested to verify the Clearance boundaries. The OP-AA-101-1000, Section 4.1, "General Requirements for Tagging," Step 3 states: Any worker that may be exposed to hazardous energy of any type and not utilizing Direct Control SHALL be protected by Danger Tags or Operating Permit tags with padlock(s) and be signed onto the Clearance as a Clearance Holder. Based on the information provided in OP-AA-101-1000, the following is factual for an example involving 250 VDC: A fuse puller rated for at least 250 VDC provides worker protection from hazardous energy specific to the act of pulling the fuse. Per OP-AA-101-1000 a clearance order is not required. Per OP-AA-101-1000 a clearance order is also not precluded from being utilized. Per OP-AA-101-1000 hazardous energy definition "... if there is any question as to a source of energy being considered hazardous then a conservative position shall be taken and the source of energy will be treated as hazardous and appropriate isolation techniques shall be used." Therefore, a clearance order would be utilized to provide worker protection from hazardous energy in the event the worker had a question if hazardous energy protection based on the worker's proximity to energized components when pulling a fuse, or a workers potential for inadvertent contact with energized components while pulling a fuse was a possibility. Per OP-AA-101-1000 in these cases, a conservative position shall be taken and isolation via a clearance order utilized.

POST-EXAMINATION COMMENT, EVALUATION, AND RESOLUTION

Question 70 stated: Which of the following work tasks requires a clearance order? Question 70 was a multiple choice question with four answer choices (A, B, C, D). To answer the question the applicant was required to unequivocally determine which one work task required a clearance order for worker protection, and which three work tasks did not require a clearance order for worker protection.

- Choice A: Replacing a SBTG train Roughing Filter. To perform this task the worker is exposed to rotating equipment if the SBTG Roughing Filter is replaced with the SBTG fan energized. The fan represents hazardous energy. Per OP-AA-101-1000, a clearance order is required to remove energy from the fan to eliminate the hazardous energy. Choice A is a correct answer to Question 70.
- Choice B: Changing Fuses in a 250 VDC system. To perform this task, the worker is exposed to 250 VDC if the fuse is changed with the circuit energized. The 250 VDC represents hazardous energy. The answer choice does not provide information if a fuse puller was used to perform the task, or if the fuse puller is rated for the system voltage. The answer choice does not provide information about the worker's proximity to energized components while changing the fuse, or if the worker could potentially inadvertently contact energized components while changing the fuse. If the applicant assumes that a fuse puller was used, that fuse puller was rated for at least 250 VDC, the worker was not in proximity to any energized components and the worker could not inadvertently contact any energized components while pulling the fuse, then a clearance order is not required for worker protection. Per OP-AA-101-1000, Attachment 10, a clearance order is not required to change a fuse in a 250 VDC system if a properly rated fuse puller is used. If the applicant does not make these assumptions and considers only the answer choice words provided, then a clearance order is required for worker protection. Per OP-AA-101-1000, a conservative position shall be taken and the source of energy will be treated as hazardous and appropriate isolation techniques shall be used if there is any question as to the source of energy being hazardous. Based on how the applicant assesses the answer choice wording, the applicant could accurately determine a clearance order was required, making Choice B a correct answer to Question 70.
- Choice C: Changing the Domestic Water Filter. To perform this task, the worker is not exposed to hazardous energy. The task is controlled by an operating instruction. Valve positions are procedurally controlled. Per OP-AA-101-1000, a clearance order is not required to perform this task. Choice C is not a correct answer to Question 70.
- Choice D: Liquid nitrogen tank delivery/refill. To perform this task, the worker is not exposed to hazardous energy. The task is controlled by an operating instruction. Valve positions are procedurally controlled. Per OP-AA-101-1000 a clearance order is not required to perform this task. Choice D is not a correct answer to Question 70.

Question 70 required the applicant to determine when a clearance is required for a set of work tasks. "When required" is different from "when not required." OP-AA-101-1000, Attachment 10 provides an example allowing fuse removal with a proper tool that does not require a clearance order. The example does not prevent the use of a clearance order for hazardous energy removal based on the circumstances of the activity. The OP-AA-101-1000 instructs one to be conservative in answering if hazardous energy exists, and if it exists, then it is to be isolated with a clearance order. The applicant would use his/her knowledge and background in

POST-EXAMINATION COMMENT, EVALUATION, AND RESOLUTION

answering Question 70. The station reviewed historical clearance orders and found that in at least one case, the applicant was involved in a clearance order for pulling 250 VDC fuses. For that clearance order the fuses pulled were large 250 VDC in-line power fuses. The 250 VDC fuses are used for in-line and control power applications.

NRC Evaluation/Resolution: The question asked the applicant to determine which of the listed work tasks required a Clearance Order, without providing any specific conditions for the work tasks. As the applicant correctly noted, configuration control was not specified. Absent any information to the contrary, the applicant must assume that the activities would be performed in accordance with approved procedures, that proper equipment would be used and used correctly to perform the tasks, and that dangerous conditions at a jobsite would be properly identified. It would be incorrect to make assumptions about jobsite hazards or use of improper equipment per NUREG-1021, Appendix E (Part B.7, Written Exam Guidelines) based on the information provided.

As the facility stated in its subsequent submittal, if a properly rated fuse puller was used, the worker was not in the proximity of any energized components, and the worker would not be expected to contact any energized components while pulling the fuse, then a Clearance Order is not required to change a fuse in a 250 VDC system. The use of a Clearance Order, based on the specific circumstances of the activity, assumes certain jobsite hazards exist to warrant the additional conservative precaution for hazardous energy removal. Per the facility's procedural requirements, the listed work task for replacing a SBGT train Roughing Filter is the only task requiring a Clearance Order. Therefore, the U.S. Nuclear Regulatory Commission (NRC) concluded that choice A, as annotated on the answer key, was the only correct answer, and the question was considered acceptable as-administered.

SIMULATION FACILITY FIDELITY REPORT

Facility Licensee: Duane Arnold Energy Center

Facility Docket No: 50-331

Operating Tests Administered: April 8, 2019, through April 11, 2019

The following documents observations made by the U.S. Nuclear Regulatory Commission examination team during the initial operator license examination. These observations do not constitute audit or inspection findings and are not, without further verification and review, indicative of non-compliance with Title 10 of the *Code of Federal Regulations*, Part 55.45(b). These observations do not affect U.S. Nuclear Regulatory Commission certification or approval of the simulation facility other than to provide information, which may be used in future evaluations. No licensee action is required in response to these observations.

During the conduct of the simulator portion of the operating tests, the following items were observed:

ITEM	DESCRIPTION
None Identified.	None Identified.