

OPERATOR LICENSING EXAMINATION RECORDS AND DOCUMENTATION

A. PURPOSE

The purpose of this Operator Licensing Manual Chapter (OLMC) is to establish an efficient and effective process for record retention and documentation pertaining to examination packages in ADAMS and operator dockets in order to support initial license examinations across all four regions. The intended audience is NRC chief examiners, examiners, and operator licensing assistants (OLAs). This OLMC establishes the process for record retention and documentation and replaces instructions previously in NUREG-1021, Operator Licensing Examination Standards for Power Reactors, Revision 11.

B. BACKGROUND

Management Directive 3.53, "NRC Records and Document Management Program," Section 3.53-01, "Policy," states, "It is the policy of the U.S. Nuclear Regulatory Commission that all official records made or received by NRC in the course of its official business comply with the regulations governing Federal records management issued by the National Archives and Records Administration (NARA) and the General Services Administration (GSA). All internally and externally generated records and documents are processed, maintained, distributed, made available to the public, and preserved or destroyed, as appropriate. The Agencywide Documents Access and Management System (ADAMS) maintains appropriate NRC unclassified, non-Safeguards, official program-related records in a centralized electronic records repository. NRC's publicly available documents are made available to the public via NRC's external Web site and the ADAMS public libraries. In addition to ADAMS, NRC maintains hard copy and electronic record and document-handling systems necessary to meet the needs of the agency. All NRC systems, including ADAMS, are designed to meet NARA regulations."

C. IMPLEMENTATION

Records associated with the licensing examination (see below) need to be placed in ADAMS as soon as possible (not to exceed 90 days) after the date of issuance for the examination report. Some of the items containing exam material are marked for delayed public release in ADAMS (see item C.5 below) 2 years after exam administration (and up to 2.5 years delay upon request) to allow facility licensees the ability to re-use both written exams and operating tests for audit examination purposes. Additional guidance can be found in the following: NRC Inspection Manual Chapter 0620, "Inspection Documents and Records," NUREG-0910, "NRC Comprehensive Records Disposition Schedule," and SECY-04-0191, "Withholding Sensitive Unclassified Information Concerning Nuclear Power Reactors from Public Disclosure."

In accordance with YA-17-0101, "Guidance for Disposition of Paper Source Documents Processed into ADAMS," paper documents should not be retained beyond 30 days after they have been added to ADAMS and declared as official agency records. If an applicant has requested an informal NRC review or a hearing, then the retention time limit of 30 days

becomes applicable in reference to the date of the resolution document (e.g., finalized Administrative Review Response, completed hearing documentation).

1. Applicant Docket Numbers

The operating licensing assistant (OLA) is responsible for the following activities:

- a. Utilizing RPS-OL and ODD to create a docket folder and a docket number for applicants when the preliminary NRC Form 398 is received by the regional office.

Note: Applications submitted via part 55 EIE result in an ODD scan to determine the applicant's docket number.

If an operator's docket number is on the application, ODD will verify that the applicant exists by docket number in RPS-OL. If the applicant exists in RPS-OL, it will return the docket number to ODD. If the applicant does not exist in RPS-OL by docket number, it will verify if the applicant exists by name and date of birth. If the applicant does not exist, then RPS-OL will create a docket number and send to ODD. RPS-OL automatically creates a docket folder in ADAMS for the applicant.

- b. Providing the facility licensee the docket numbers for new applicants on Form 2.2-1, "List of Applicants," after the final certified application is received from the facility licensee (See NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," ES-2.2).

Note: Use the existing docket numbers for applicants that have previously applied or have been licensed.

2. Examination Files

The items listed below are records and retained to satisfy the retention requirements of MD 3.53. In addition, examiners review previous operating tests and written examinations records to verify compliance with the NUREG-1021 instructions and limitations for test item repetition. For LSRO examinations, retain the equivalent LSRO forms from ES-7.1.

- a. ES-2.1, Letter 2.1-1, "Corporate Notification Letter"
- b. ES-2.3, Letter 2.3-1, "Examination Approval Letter," with pen-and-ink changes on Form 2.2-1, "List of Applicants," as necessary to identify the applicants who were actually examined
- c. Form 1.3-1, "Examination Security Agreement"
- d. Form 2.1-1, "Examination Preparation Checklist"

- e. The written examination outlines: Form 4.1-BWR, "BWR Examination Outline," Form 4.1-ABWR, "ABWR Examination Outline," Form 4.1-PWR, "PWR Examination Outline," or Form AP, "AP-1000 Examination Outline" and Form 4.1-COMMON, "Common Examination Outline"
- f. Form 4.1-1, "Record of Rejected Knowledge and Abilities"
- g. The operating test outlines: Form 3.2-1, "Administrative Topics Outline," Form 3.2-2, "Control Room/In-Plant Systems Outline," and Form 3.3-1, "Scenario Outline"
- h. Form 2.3-1, "Examination Outline Quality Checklist"
- i. the proposed NRC- or facility-developed operating tests and written examination (including comments made by the facility licensee or the NRC, as applicable)
- j. Form 2.3-4, "Written Examination Quality Checklist"
- k. Form 2.3-5, "Written Examination Review Worksheet," and any reference handouts
- l. Form 2.3-2, "Operating Test Quality Checklist"
- m. Form 2.3-3, "Operating Test Review Worksheets"
- n. the final written examination and answer key with all changes incorporated (the pen-and-ink corrections made for the applicants while the examination was administered may be changed to typewritten corrections; however, all changes need to be annotated in such a way that they are evident).
- o. the as-administered operating examination (all record copies should reflect the "as-run" test conditions; pen-and-ink markups of the original, approved forms are acceptable), including:
 - Form 3.2-1, "Administrative Topics Outline,"
 - Form 3.2-2, "Control Room/In-Plant Systems Outline," and the JPMs for each walkthrough test
 - Form 3.3-1, "Scenario Outline" for each scenario administered
 - Form 3.3-2, "Required Operator Actions" for each scenario administered
 - Form 3.4-1, "Events and Evolutions Checklist"

Note: Spare scenarios do not need to be uploaded to ADAMS unless the scenario, or portions of it, were used during the operating test
- p. Form 5.1-1, "Postexamination Check Sheet"

- q. Form 5.1-3, "Power Plant Examination Results Summary"
- r. the final Examination Report with all enclosures
- s. The facility licensee's (and applicant's) specific comments and recommended changes regarding the operating and written examinations that were administered. Redact applicant's names and any other personally identifiable information from the document. The NRC regional office must retain a nonredacted version, indicating applicant docket numbers, until any adjudicatory hearings are complete

3. Applicant Docket Files

The NRC's regional office shall place the following items in each applicant's docket file in ADAMS:

- a. For applicants who successfully passed all portions of the exam:
 - i. Form 5.1-2, "Individual Examination Report"
 - ii. Form 4.2-3, "Reactor Operator Written Examination Cover Sheet," or Form 4.2-4, "Senior Reactor Operator Written Examination Cover Sheet"
 - iii. The applicant's original answer sheet with grading and annotations to demonstrate the applicant's incorrectly selected answers
 - iv. Form 3.6-1, "Job Performance Measure Grade Report"
 - v. Form 3.6-2, "Reactor Operator Simulator Scenario Grade Report", or Form 3.6-3, "Senior Reactor Operator Simulator Scenario Grade Report" (original copies and all pages, including strip charts and other attachments that support the licensing decision)
 - vi. Form 3.3-1, "Scenario Outline"
 - vii. Form 3.6-4, "Operating Test Comments" or equivalent form that captures any required comments
- b. For all applicants who failed a portion of the examination:
 - i. Form 5.1-2, "Individual Examination Report"
 - ii. Form 4.2-3, "Reactor Operator Written Examination Cover Sheet" or Form 4.2-4, "Senior Reactor Operator Written Examination Cover Sheet"

- iii. The applicant's original answer sheet with grading and annotations to demonstrate the applicant's incorrectly selected answer options
- iv. Form 3.6-1, "Job Performance Measure Grade Report." Include all required documentation, including the as-administered JPM material, for JPM failures leading to overall Operating Test failures.
- v. Form 3.6-2, "Reactor Operator Simulator Scenario Grade Report", or Form 3.6-3, "Senior Reactor Operator Simulator Scenario Grade Report" (original copies and all pages, including strip charts and other attachments that support the licensing decision)
- vi. Form 3.3-1, "Scenario Outline"
- vii. Form 3.3-2, "Required Operator Actions" (all record copies should have the required signatures and reflect the "as-run" test conditions; pen-and-ink markups of the original, approved forms are acceptable). Include all required documentation, including the as-administered scenario material, for scenario failures leading to overall Operating Test failures.
- viii. Form 3.6-4, "Operating Test Comments" or equivalent form that captures comments
- ix. Entire written examination to include answer and distractor analysis for written examinations with an overall failing grade.
- x. All correspondence with the applicant to include, but not limited to:
 - Preliminary Results Letter (Letter 5.1-3, "Preliminary Results Letter")
 - From OLMC-500, "Processing Requests for Administrative Reviews and Demands for Hearings" correspondence, as applicable:
 - i. Attachment 2, "Notification of Passing the License Examination- Cover Letter"
 - ii. Attachment 3, "Notification of Failing the License Examination and Application Denial – Cover Letter"
 - iii. Attachment 4, "Administrative Review Report for a Written Examination"

iv. Attachment 5, "Administrative Review for an Operating Test"

- Formal communication related to hearing results

4. Reference Materials

The following information is provided for the handling and storage of facility licensee provided reference material used for examination development by examiners:

- Reference materials should be kept long enough to ensure that references are available if needed for potential appeals or hearings. After the appeal and/or hearing request time frames have expired, reference materials may be handled per the instructions in this step.
- If the facility licensee requests that the NRC return reference material, then the NRC chief examiner shall ensure that the material is returned to the facility licensee as soon as possible after the examination.
- If the facility licensee does not want the physical reference material to be returned, then the NRC chief examiner shall ensure that the materials provided for NRC examiners to use in preparing for the examination are no longer required in the grading process and that they are properly dispositioned through approved destruction methods provided in MD 3.53.
- When the NRC chief examiner has determined that the reference material is no longer required in the grading process, the NRC chief examiner shall ensure that the electronic media is dispositioned appropriately through approved methods provided in MD 3.53.

5. Delayed Release of Examination Material

IOLB and regional offices will delay public release of the following examination related documents for two years from the date of the examination, with an allowable extension of up to 2.5 years upon request from the facility licensee:

Note: The delayed release policy does not affect Freedom of Information Act (FOIA) requirements. If any of the documents listed below are requested through a FOIA request prior to public release, the request must be fulfilled in accordance with NRC FOIA procedures and timeliness requirements.

- Written examination and operating test outline(s) and worksheet(s):
 - Form 4.1-BWR, "Boiling-Water Reactor Examination Outline"
 - Form 4.1-PWR, "Pressurized-Water Reactor Examination Outline"

- Form 4.1-AP, "AP1000 Examination Outline"
 - Form 4.1-ABWR, "Advanced Boiling-Water Reactor Examination Outline"
 - Form 4.1-COMMON, "Common Examination Outline"
 - (Or the equivalent LSRO forms from ES 7.1)
- b. Form 4.1-1, "Record of Rejected Knowledge and Abilities (or the equivalent LSRO forms from ES 7.1)
- c. The proposed NRC- or facility-developed operating tests and written examination
- d. Final written examination and answer key with all changes incorporated and any reference handouts (or a list thereof) provided to the applicants
- e. In the case of an examination without any failures, a copy of the facility licensee's (and applicant's) specific comments and recommended changes regarding the operating and written examinations that were administered. Redact applicant's names and any other personally identifiable information from the document.
- f. Form 2.3-5, "Written Examination Review Worksheet"
- g. The as-administered scenarios to include:
- Form 3.3-1, "Scenario Outline"
 - Form 3.3-2, "Required Operator Actions"
- h. The as-administered walkthrough examination items to include:
- Form 3.2-1, "Administrative Topics Outline"
 - Form 3.2-2, "Control Room/In-Plant Systems Outline"
- i. Form 2.3-3, "Operating Test Review Worksheets"
6. Normal Release of Examination Material

The following documents are required to be retained by the regional offices and should be released normally using Form 665 for public disclosure:

- a. Letter 2.1-1, "Corporate Notification Letter", or similar.
- b. Form 2.1-1, "Examination Preparation Checklist"
- c. Letter 2.3.-1, "Examination Approval Letter." or similar.
- d. Form 2.3-1, "Examination Outline Quality Checklist"

- e. Form 2.3-2, "Operating Test Quality Checklist"
- f. Form 2.3-4, "Written Examination Quality Checklist"
- g. Form 1.3-1, "Examination Security Agreement"
- h. Form 5.1-1, "Post examination Check Sheet"
- i. The final examination report with all enclosures. The examination report should continue to cite the accession number(s) for the final examination(s) but indicate that the release of these documents will be delayed and include the delayed release date.
- j. In the case of an examination failure, a copy of the facility licensee's (and applicant's) specific comments and recommended changes regarding the operating and written examinations that were administered. Although post-examination comments contain examination material, these comments, with applicants' names redacted, must be immediately released so that an applicant may review the NRC's response to the comments for the purposes of requesting a staff review or demand a hearing.

7. Examination Material Withheld from Public

The following documents are required to be retained by the regional offices and shall be withheld from public disclosure:

- a. Form 2.2-1, "List of Applicants"
- b. Form 5.1-3, "Power Plant Examination Results Summary"

8. Handling Proprietary Examination Material

The following instructions are for regional offices that are required to handle proprietary information related to examination records for facility licensees. (e.g., AP-1000 examinations):

- a. Create a publicly available ADAMS package and include all required documents per steps 2, 5, and 6 into the package. Redact any proprietary information from every document in this package including any Personally Identifiable Information (PII). Redact information before placing the document in the ADAMS package.
- b. Create an additional, non-public, ADAMS package that includes all required documents per steps 2, 5, 6, and 7 into the package. Do not redact proprietary information from the documents in this package.

Note: If there is PII, redact the PII information regardless of which package is being developed.