



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001**

November 5, 2020

MEMORANDUM TO: Christian B. Cowdrey, Chief
Operator Licensing and Human Factors Branch
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

FROM: Travis D. Iskierka-Boggs, Reactor Engineer (Examiner Qualified) **/RA/**
Operator Licensing and Human Factors Branch
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF OCTOBER 22, 2020, PUBLIC MEETING WITH
INDUSTRY OPERATOR LICENSING REPRESENTATIVES

On October 22, 2020, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting with representatives of the Nuclear Energy Institute's Licensed Operator Focus Group and other industry operator licensing representatives.

This meeting was the latest in a series of meetings intended to promote efficiency, effectiveness, and open communications. The discussions addressed a variety of operator licensing topics, including: Proposed Changes to Operating Test Grading, Operator Education and Experience requirements, and an update on NUREG-1021, Operator Licensing Examination Standards for Power Reactors, Revision 12.

Representatives of the NRC and the nuclear industry agreed that this meeting was useful for the exchange of information and agreed to continue the periodic meetings.

Enclosures:

1. List of Attendees
2. Agenda
3. Discussion Summary

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SUBJECT: SUMMARY OF OCTOBER 22, 2020, PUBLIC MEETING WITH INDUSTRY
OPERATOR LICENSING REPRESENTATIVES Dated: November 05, 2020

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OFFICE	NRR/DRO/IOLB	NRR/DRO/IOLB
NAME	TIskierka-Boggs	CCowdrey
DATE	11/05/20	11/05/20

OFFICIAL RECORD COPY

List of Attendees – Public Meeting with Industry Operator Licensing Representatives
October 22, 2020

Name	Organization (via Microsoft Teams/Phone)
Christian Cowdrey	NRC
Theresa Buchanan	NRC
Lauren Nist	NRC
Travis Iskierka-Boggs	NRC
Maurin Scheetz	NRC
Jesse Seymour	NRC
Bernard Litkett	NRC
Patricia Pelke	NRC
Eugene Guthrie	NRC
Greg Werner	NRC
Matt Emrich	NRC
Gerry McCoy	NRC
Travis Tate	NRC
John Kirkland	NRC
Matt Doyle	NRC
Nick Hernandez	NRC
Phillip Capehart	NRC
Kelly Clayton	NRC
Mike Donithan	NRC
Mike Kennard	NRC
Michael Meeks	NRC
Tim Riti	Nuclear Energy Institute
Kostas Dovas	Exelon
Gregg Ludlam	Entergy
Richard Baird	NextEra
Russell Joplin	Tennessee Valley Authority

Gary Ohmstede Chuck Howard Anderson Renaud Ken Jenkins Stan Jackson Jeremy Jefcoat Jason Overstreet Andy Nichols Mark Verbeck Oliver Bertagnolli Darren Sanders Stephen Reid	Southern Nuclear Company
Nadja Jorgensen	NuScale
Jim Osborn	NuScale
Pat Leary	NuScale
Doug Bowman	NuScale
James Knapp Michelle Meyer William Isom Jack Myers	Wolf Creek
Zac Robinson Craig Prost Doran Nealon Kelly Robertson Marty McAdory Wally Lien Jason Stone Kevin Heaslet Rob Green Gene Hori Jeff Lux	Columbia Generating Station
Paul Williams Jr Ben Overton	Hope Creek / Salem
Travis Ouret	Florida Power and Light
Jeffrey Skov Jared Smith Kevin Dumas Shannan Tolley	Pacific Gas and Electricity
Mory Diane Sean Dornseif Zachary Goldwasser Jared Shaver Dusty Lowdermilk	Palo Verde Generating Station

Kristen Harper Tod Kaspar	DC Cook Nuclear
Bobby Simpson	South Texas Project
Rick Murray	Entergy
Chris Riedl	Tennessee Valley Authority

AGENDA FOR THE U.S. NUCLEAR REGULATORY COMMISSION CATEGORY 2
PUBLIC MEETING WITH INDUSTRY OPERATOR LICENSING REPRESENTATIVES

Tuesday, October 22, 2020, 10:00 AM to 11:00 AM. Eastern Standard Time

Teleconference

<u>TOPIC</u>	<u>PRESENTER</u>
Introductions and Opening Remarks	NRC
Proposed changes to operating test grading	NRC/Industry
Operator education and experience requirements	NRC/Industry
NUREG-1021, Revision 12 Update	NRC/Industry
Public Comment	Public
Closing Remarks	NRC/Industry

DISCUSSION SUMMARY

There was no presentation material provided for this public meeting.

Proposed Changes to Operator Test Grading:

The staff presented information to the industry regarding the proposed change in grading of critical tasks for the operating test that will allow equitable, consistent grading across the regions using a risk-informed, performance-based approach. Members of the industry voiced support for portions of the effort, and also provided concerns with the proposed change to the grading.

The staff presented findings related to the regrading of 417 previous year exam records using the proposed grading criteria. Based on the proposed grading criteria, the staff found the projected net increase in failure rate to be 2.4% (10 more net failures per 417 applicants). The Licensed Operator Focus Group presented information from a case study that involved three nuclear facilities grading 43 applicants using the new grading criteria. The case study resulted in a larger net increase of failure rates of 7% when applied to the 43 applicants.

The Licensed Operator Focus Group expressed concern because of the higher failure rate, the impacts of cumulative regulatory changes in operator licensing, and because the current critical task guidance that was modified in 2017 is working as established. Additionally, the Licensed Operator Focus Group stated that the operators that would have failed under the proposed guidance are currently executing their duties competently and are performing well in their annual regulatory requalification examinations. The Licensed Operator Focus Group made comments in support of other proposed changes including the proposed significant error criteria. The staff responded by stating that current on-shift performance is not an effective predictor of how an operator will perform during an emergency, as major event emergency operating procedures are not routinely implemented. The staff further stated that NRC only samples a portion of requalification examinations, and that the initial license examination is the only opportunity that the NRC has to directly verify an applicant's ability to perform essential tasks prior to going on shift. The staff responded that the proposed grading approach provides risk-based, equitable grading criterion that will allow for grading applicants consistently across regions. NRC staff further emphasized that the net increase in failure rates based on a larger sample group is lower overall than in the case study performed by the Licensed Operator Focus Group.

Operator Education and Experience Requirements:

The staff provided an update on the draft revision of ACAD 10-001, Guidelines for Initial Training and Qualification of Licensed Operators, pertaining to operator education and experience requirements. The staff informed the industry that the draft guidelines are being evaluated, with questions pertaining to the draft to be sent to NANT in the near future. As important guidelines that get applied to the licensing of operators at nuclear facilities, the staff deemed it important to inform the public that there will be upcoming changes for the guidelines. However, the guidelines are proprietary information and details could not be released for the public meeting. The outcome of the staff's evaluation will be incorporated with Revision 12 of NUREG-1021, Operator Licensing Examination Standards for Power Reactors.

The staff also provided a link to the current NANT guidelines that was made publicly available by the Academy (<https://www.nrc.gov/docs/ML1905/ML19053A433.pdf>).

NUREG-1021, Revision 12 Update

NUREG-1021, Revision 12 Update:

The staff provided an update to NUREG-1021, Revision 12. The NRC staff expect to release the revision for a 60-day public comment period within the next month. The staff recommended that the entire revision be reviewed because of significant changes to the organization and presentation of information.

The Licensed Operator Focus Group provided comments that the review period will fall over a holiday period and questioned if the NRC had taken this into account. The staff responded that they will consider adjusting the 60-day review period to account for the holidays and allow adequate time for review and comment. The staff intends to hold additional public meetings to discuss comments received prior to finalizing the NUREG in the summer of 2021.

Industry and Public Comments

The staff and industry representatives commented that the meeting was appreciated and that more meetings should be planned prior to revising NUREG-1021.

There were no questions to the NRC from the public during this public meeting.

Region IV provided information during the public meeting pertaining to scan quality of documents being entered in the Operator Digital Docket (ODD) program. Staff have observed an increase in instances where operator licensing documents that are submitted fail to get properly loaded into ODD due to poor scan quality, or signatures bleeding into other fields. NRC staff emphasize that minimum scan quality is 300 dpi, with 400 dpi or higher being preferred. Furthermore, the staff stressed the importance of downloading a new form each time it is needed, as opposed to copying a previous form or scanning and signing electronically, as these types typically get rejected.