

Operator Licensing Meeting With NEI on April 26, 2000	
NEI Issues (from handout)	Discussion Summary
<p>1. NUREG 1021 Supplement Several items in supplement are a "surprise", such as admin portion of written exam must contain 10 SRO-only questions, use of INPO Exam Bank restrictions, etc. 80-10-10 Question Selection Implementation - how does this interface with use of INPO Exam Bank questions?</p>	<ul style="list-style-type: none"> - The NRC staff explained the basis for the revised guidance regarding the distribution of the 25 SRO-only questions on the written exam and provided historical perspective for this issue. The industry representatives appeared to agree with the logic and were reminded that the public comment period for proposed Supplement 1 runs until June 19, 2000. - The NRC staff explained that questions taken from the INPO bank could not be treated as new because it was a predictable source that the applicants would likely study to prepare for the examination. However, such questions would be still be subject to detailed review by the NRC unless they had been previously validated at that facility. - The NRC staff explained that it is planning to implement the 80-10-10 question distribution on the generic fundamentals examination (GFE) starting in 2001 but that it is deferring similar action on the site-specific examination until it has a chance to evaluate the INPO question bank. The NRC did agree to develop criteria that will have to be met to justify such a change. The NRC also emphasized the importance of maintaining an infusion of new and modified questions on every examination.
<p>2. NRC Generic Letter (or similar) to announce NRC acceptance of ACAD 00-003 and to direct revising-out licensing basis references to ANSI N18.1-1971, ANSI 3.1-1981, etc. Also delete experience requirements in NUREG 1021 ES-202.</p>	<p>The industry representatives indicated that licensees are reluctant to delete references to the old ANSI standards from their licensing basis documents until the NRC formally acknowledges that the education and experience requirements in ACAD 00-003, "Guidelines for Initial Training and Qualification of Licensed Operators," are acceptable. The NRC staff acknowledged their concern and indicated that it would consider addressing this issue in a generic communication and/or final Supplement 1 to Revision 8 of NUREG-1021.</p>
<p>3. Long Term ILO Written Exam (Options 3 and 4)</p>	<p>The industry representatives indicated that they were planning to prepare a concept paper that would further develop Option 3 (utility preparation and administration of the written exams with NRC oversight and inspection similar to the requalification program but without prior NRC review) that was previously discussed with the NRC during a public meeting on December 16, 1999 (Accession No. ML 003674091). The NRC staff agreed to further explore that option with the industry and indicated that Commission approval would be required, that a rule change would probably be necessary, that a parallel pilot program might be possible, and that a period of stability might be appropriate before such a significant change is pursued in earnest. The NRC staff also cautioned that the elimination of prior NRC review might be a stumbling block and that compensatory measures would be necessary to maintain public confidence.</p>

<p>4. NUREG 1262 revision/mark-up Discussion between group indicates this effort needs to continue. Several items in 1262 are now outdated, inaccurate, etc.</p>	<p>The NRC staff acknowledged that a number of the answers in NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," are no longer germane in that they have been overtaken by events and the answers to frequently asked questions (FAQs) on the NRC's Operator Licensing Website. The NRC indicated that it views the NUREG as a historical document and that it does not have the resources to revisit every question therein. The industry representatives proposed to identify those questions and answers that they believe are still valid and the NRC will consider providing clarification via the FAQs on the website.</p>
<p>5. GFES Exam Administration (either flexibility on administering as needed, or on-demand exam administration)</p>	<p>The NRC staff indicated that it is planning to implement the 80-10-10 (bank, modified, new) question distribution starting in 2001 but emphasized that it continues to see the need for an infusion of new and modified questions on every examination. Consequently, it may not be practical to provide examinations on-demand. The staff suggested two possible remedies: licensees could prepare the examinations in accordance with NRC criteria and subject to NRC review and approval of the new and modified questions before the exam is administered, and the NRC would consider adding a fourth annual GFES sometime in the future if the need exists and funding is available. The staff also noted that any future changes for this program would have to be coordinated with the long-term plan for the written exam (Item 3).</p>
<p>6. Reactivity Manipulations - Status of rule change to allow performance on simulator (LaSalle to pilot via exemption within next few weeks)</p>	<p>The NRC staff reported that the proposed rule change is before the Commission for approval and should be issued for a 75-day comment period in the near future. The staff suggested that licensees interested in requesting an exemption should review and address the criteria discussed in the rulemaking plan (SECY-99-225), which was issued in September 1999, and contact the NRR operator licensing program office if they have any questions. The staff also indicated that the NRC is planning to conduct a workshop to clarify the NRC's simulator standards and expectations.</p>
<p>7. Future 1021 Changes What are the ground rules for future revisions to NUREG 1021? Can we start with a clean sheet of paper, or are there certain "sacred cows" that we can't touch?</p>	<p>The industry representatives expressed an interest in simplifying the examination process in future revisions of NUREG-1021, but the NRC staff cautioned that it would be reticent to remove any guideline or criterion unless the basis for including it in the first place was determined to be outdated. The staff emphasized that the existing testing and measurement principles, standards for validity, security, and objectivity (i.e., no essay exams) would have to be maintained, but it indicated that the current level of NRC review might be reduced for licensees with a good performance history in the exam preparation area. Any efforts related to this issue would certainly have to be coordinated with the long-term plan for the written exam (Item 3).</p>

<p>8. Requal Issues:</p> <ul style="list-style-type: none"> * Annual exam is required within a "calendar year" while the biennial exam requirement is stated to be required within 24 calendar months. This poses resource constraints for new licenses and their integration into the requal program. * Required manipulation tracking (Denton Letter List) is still vague * Remove static exams from NUREG 	<ul style="list-style-type: none"> - The NRC staff informed the industry that the definitions of "annual" and "biennial" (in Appendix E of NUREG-1021) were developed in consultation with the Office of the General Counsel and acknowledged that they do not appear to be consistent. The NRC agreed to study this issue. - The industry representatives indicated that someone in the NRC had at one time said and that the questions and answers in NUREG-1262 imply that the control manipulations required by 10 CFR 55.59 do not have to be tracked on an individual basis. The NRC staff acknowledged that the rule does not specifically address this aspect of record-keeping, but reiterated its concern that some passive operators may not maintain adequate proficiency if they are given credit for manipulations that they watched but did not perform. - The NRC acknowledged the industry's concern in this area and indicated that removal of the static written examination would require some type of compensatory replacement. The NRC also reminded facility licensees that they are not required to conduct their periodic requalification examinations in accordance with NUREG-1021 (unless that is what their approved program requires).
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