

IN RESPONSE, PLEASE
REFER TO: M920602

June 23, 1992

MEMORANDUM FOR: James M. Taylor
Executive Director for Operations

William C. Parler
General Counsel

FROM: Samuel J. Chilk, Secretary

SUBJECT: STAFF REQUIREMENTS - BRIEFING ON STATUS OF
LICENSED OPERATOR REQUALIFICATION PROGRAM AND
COMPLEX SIMULATOR SCENARIOS (SECY-92-100 AND
SECY-92-154), 10:30 A.M., TUESDAY, JUNE 2,
1992, COMMISSIONERS' CONFERENCE ROOM, ONE
WHITE FLINT NORTH, ROCKVILLE, MARYLAND (OPEN
TO PUBLIC ATTENDANCE); AND
SECY-92-100 - STATUS AND DIRECTION OF THE
LICENSED OPERATOR REQUALIFICATION PROGRAM

The Commission¹ was briefed by the NRC staff on the status of licensed operator requalification program and complex simulator scenarios.

The Commission (with all Commissioners agreeing) has approved the implementation of the pilot examination method for operating tests administered at each facility, with the understanding that the NRC has the authority to address potential concerns that might arise from subsequent licensee modifications of crew makeup. The Commission has noted the staff's intent to implement the pilot method at the facility's option until the examination procedures are revised, published for public comment, and incorporated in a revision to NUREG-1021.

SECY NOTE: THIS SRM AND THE VOTE SHEETS OF ALL COMMISSIONERS WILL BE MADE PUBLICLY AVAILABLE WHEN ISSUED TO THE STAFF. SECY-92-100 WAS RELEASED TO THE PUBLIC AT THE COMMISSION BRIEFING ON JUNE 2, 1992.

¹ Commissioner de Planque was on travel and did not attend this briefing.

The staff should continue to provide the Commission with information on the pass/fail rates for operator requalification examinations on an annual basis. This should include a comparison of the pass rate using the pilot method with the pass rate based on the historical individual requalification criteria, similar to that provided in Enclosure 1 to SECY-92-100.

(EDO)

(SECY Suspense: 2/26/93)

In both developing the proposed rule changes to eliminate the requirement for the NRC to examine each operator during a 6-year license as well as a revised inspection program for this area, the staff should -- consistent with provision IV.B.(i) of the Charter for the Committee to Review Generic Requirements (CRGR) -- utilize results-based approaches to the maximum extent possible. The Commission should be apprised of several items:

- o A detailed discussion of the proposed inspection program that will accompany the new approach, including a discussion of -- (i) how the results of the inspections will be used in the SALP evaluation process; (ii) how other related inspections (e.g. EOP inspections) will be integrated into the overall inspection program envisioned by the staff, so as to ensure appropriate licensee attention to these inspection reports; and (iii) how licensee adherence to appropriately high standards for examination development and grading will be verified;
- o The resource projections for the next four years for implementation of the new approach, compared to the resources that would be required under the existing approach; and
- o A review of the legal issues associated with the proposed approach, including a discussion of the extent to which this approach comports with section 306 of the Nuclear Waste Policy Act of 1982 and with the statements and assurances that the Commission has made in the litigation of this provision.

(EDO/OGC)

(SECY Suspense: 9/30/92)

In formulating the rule, the staff should:

- o Provide a strong technical justification for initiation of the rulemaking and should indicate at what point in time the idea of rulemaking on this matter was first discussed,

- o Consider the use of human cognitive reliability (HCR) techniques in the evaluation of individual and crew performance during the simulator tests,
- o Provide a more flexible grading system for use when conducting a follow-up on performance deficiencies identified in the simulator test. The follow-up should be graded in a different manner than the historical method, which used rigid criteria whereby one error resulted in automatic failure, and
- o Provide for explicit criteria to be used in making the decision to administer the NRC requalification examination.

(EDO)

(SECY Suspense:

9/30/92)

The staff, in developing inspection guidance for the requalification programs, should ensure that the guidance is not used as a mechanism to drive licensees' programs in a direction which causes the scope of those programs to reach beyond the continuing training found necessary for the sustained safe operation of the plants.

While this rule change should result in safer operations, the staff should inform the Commission if the margin to safe operations is discovered to be lost as a result of this change.

cc: The Chairman
Commissioner Rogers
Commissioner Curtiss
Commissioner Remick
Commissioner de Planque
OCAA
OIG
ACRS
PDR - Advance
DCS - P1-24