



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

RECEIVED

200 OCT 18 AM 8:27

Rules and Directives
Branch
USNRC

7-17-00

65 FR 44080

6

October 12, 2000

Chief, Rules and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Gentlemen:

NUCLEAR REGULATORY COMMISSION (NRC) - SUPPLEMENTARY CHANGES TO
REVISION 8 OF NUREG-1021, "OPERATOR LICENSING EXAMINATION STANDARDS
FOR POWER REACTORS" (Volume 65 Federal Register 44080)

TVA is pleased to provide comments related to the proposed
supplementary changes to NUREG 1021. The enclosure provides
comments in response to the NRC's request published in the *Federal
Register* on July 17, 2000.

TVA's comments are provided in the enclosure. If you have any
questions, please contact Rob Brown at (423) 751-7228.

Sincerely,

Mark J. Burzynski
Manager
Nuclear Licensing

Enclosure

cc (Enclosure):

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

ADM03

ER105-03

Template ADM013

Add
Siegfried Guenther
David Trimble

ENCLOSURE

NUREG 1021 References	Comment
ES-102 Paragraph 2i, page 9 of 24	Provides good clarification of responsibilities.
ES-201 Paragraph D.2, page 14 of 24	Provides good clarification of supervisor and manager involvement.
Form ES-201-2, 1.b	The evaluation of this item is still subjective and based on opinion.
ES-202 Paragraph B, pages 1, 2 of 12	Provides good changes in what is necessary to document candidate qualification.
ES-202 Paragraph C.2.b, page 5 of 12	"As noted . . ." -- This paragraph is good for the instructor wanting an SRO license.
ES-202 Paragraph D.1.b(1), page 7 of 12	TVA does not recommend changing from 13 weeks to 3 months.
ES-202 Paragraph D.1.b(3), page 8 of 12	The note will help with future license classes.
ES-202 Paragraph D.2.a(1), page 9 of 12	Provides good change for experience from 4 years to 3 years.
ES-202 Paragraph D.2.a(2), page 9 of 12	The military positions listed are equivalent to an SRO, not an RO.
ES-204 Paragraph D.1.i, page 5 of 6	Provides good clarification of guidance.
Form ES-301-5	Changes will make scenarios longer and will not likely meet the 60 to 90 minutes window.
ES-302 Paragraph D.2.b, page 6 of 10	New paragraph would help with JPM administration in difficult areas.
ES-401 Paragraph C.1.f, page 2 of 45	Provides good clarification of options for exam development.
ES-401 Paragraph D.1.b, page 3 of 45 last paragraph	TVA will need to submit a list of de-selected K/As. This will necessitate use of the WOG program and place a high priority on the Exam Bank Action Plan.
ES-401 Paragraph D.1.c, page 4 of 45	Requires only SRO objectives. This will also require modification of the WOG K/A program to facilitate sample plan development.
ES-401 Paragraph D.2.c, page 6 of 45	This changes the time requirement back to 4 hours.
ES-401 Paragraph D.2.f, page 7 of 45	This new paragraph will require that TVA submit the entire exam bank in order to verify this rule.
ES-401 Paragraph E.2.d, page 11 of 45	NRC will not be able to verify this until post exam or on the next exam submittal.
ES-401 Paragraph E.4, page 12 of 45	TVA will need to remove coworkers and cannot use on-shift operators for validation.
Form ES-401-7, page 42 of 45	Provides good change to the form.
Form ES-401-9, page 44 of 45	Provides appropriate changes.
ES-403 paragraph D.1.d, page 3 of 5	It is not clear how utilities will document this to NRC. How will NRC verify?
ES-501 paragraph 3.a, pages 8, 9 of 22	Provides no real changes or new information.
ES-502 paragraph c.2.b, page 3 of 4	Why regulate this action. How will NRC verify?
Appendix D, B.1, page 2 of 40	Provides good change to delete objectives descriptions.
Appendix D, C.2.h, page 11 of 40	This is not realistic. Scenarios have not been 60-90 minutes since the inception of the pilot process.
Appendix E, Part B, page 1 of 5	The time conflicts with ES-401. Will the time be 4 or 5 hours?
Appendix F, page 2 of 7	The significance of the "Designate Nuclear Control Room Operator" definition is not clear.
Appendix F, page 5 of 7	Responsible nuclear power plant experience or the reduction from 2 years to 1 year of credit may effect instant SRO candidates.