

REACTOR FACILITY
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October 24, 2000

To: Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555
Marvin Mendonca, Senior Project Manager, NRC

From: Stephen Frantz, Reed Reactor Facility, Docket 50-288

Re: Proposed Change to Requalification Plan

Enclosed is a proposed revision to the Reed Reactor Facility Requalification Plan. This revision should not decrease the effectiveness of the plan. The revision has been approved by the Reed Reactor Operations Committee. The major change is to eliminate our internal requirement for Accelerated Requalification Program for operators who pass the biannual written exam with less than 80%. The changes are discussed below:

- ¶1.0 Eliminated reference to the date of the Code of Federal Regulations used. The intent is to use the most recent version.
- ¶3.1 Reworded the sentences to be clearer. Expanded topics for requalification lectures to include fitness for duty, harassment policies, and other topics relevant to safe operation.
- ¶3.3 Specified an acceptable manner to document that an operator has reviewed the material in a requalification session that he or she has missed.
- ¶4.3 Specified that the director or designee shall review operator records to ensure that operators maintain requalification.
- ¶6.1 Specified that operating exams are required each academic year, not each calendar year.
- ¶7.0 Included ¶7.1 into next paragraph and renumbered the section. Eliminated the requirement for Accelerated Requalification in the case of an operator who passes the written or operational exam, but fails to achieve 80%.

This had been a check to required additional training for operators who passed the exam with at least a score of 70%, yet did not show a superior knowledge by exceeding 80%. This requirement has proved difficult to implement correctly. It also raised the question of whether new operators who passed the Nuclear Regulatory Commission Exam with a score of less than 80% should immediately go into an Accelerated Requalification Program, which the facility has never required.

The issue of marginal operators will be left to the discretion of the Director, who is authorized to require an Accelerated Requalification Program of any operator who in the opinion of the Director is clearly deficient in operating knowledge or skills.

This paragraph was also corrected to indicate that operators have to achieved a score of 70% in each section of the written exam, and just an overall score of 70%.

- ¶8.0 Added a new ¶8 and renumbered ¶9. ¶8 lists the requirements for physical examinations and the expirtation term of licenses.

Please contact me if you have any questions.

Sincerely,

Stephen G. Frantz
Director, Reed Reactor Facility

Reed Reactor Facility Requalification Plan

1.0 INTRODUCTION

- 1.1 This Requalification Plan is developed in compliance with the requirements of 10CFR55.59.

2.0 SCHEDULE

- 2.1 The Requalification Program shall be continuous and operate on a two year cycle. For purposes of this Plan, a year begins on July 1 and ends on June 30 ; calendar quarters are as follows:

First Quarter:	July 1 to September 30
Second Quarter:	October 1 to December 31
Third Quarter:	January 1 to March 31
Fourth Quarter:	April 1 to June 30

3.0 LECTURES AND MEETINGS

- 3.1 A minimum of five lectures shall be scheduled during each school year (i.e., ten each requalification cycle), with a minimum of two each semester. These shall be designated by the Director as Requalification Lectures. The subjects of these lectures may be drawn from the topics listed below. The specific content of the lectures is to be based on items identified as weaknesses in the training program or operator knowledge. These weakness may be identified using the results on NRC licensing exams, facility administered requalification exams described in this plan, or observations of operator knowledge and performance by the Reactor Director. It is not required that all topics be covered in any given requalification cycle. A single lecture may address more than one topic.

- a) Theory and principles of reactor operation
- b) Reactor instrumentation, control, and safety systems
- c) Radiation control and safety; use and handling of radioactive materials
- d) Facility and Regulatory requirements including License, Technical Specifications, Requalification and Emergency Plans, Administrative Procedures, and applicable portions of Title 10 Code of Federal Regulations.
- e) Standard and Emergency Operating Procedures
- f) General and specific plant operating characteristics
- g) Fitness for duty requirements for operators.
- h) Harassment policies
- i) Other topics identified by the reactor staff as relevant to the safe operation of the reactor in accordance with federal and state regulations.

- 3.2 Reviews of Facility Changes: At least twice each year (i.e., four times each requalification cycle), a meeting of Reactor Operators and Senior Reactor Operators shall be held to make them aware of facility design changes, and changes in procedures and administrative requirements. This meeting may be held in conjunction with a Requalification lecture or may be held separately, at the discretion of the Director. Written reviews of changes to the facility should be placed in the Notice to Operators Log.

- 3.3 Any operator who is absent from any required meeting shall review any notes, handouts, tape recordings, video recordings, or other reference material from the meeting. This material shall be discussed with the Director (or his designate) to assure the Facility that the operator has understood the material and this discussion shall be documented. It is acceptable to document the operator's review by signing and dating the attendance record from the lecture the operator missed.

4.0 ON-THE-JOB TRAINING

- 4.1 Each Reactor Operator and Senior Reactor Operator must actively perform the functions for which they are licensed for a minimum of 4 hours per calendar quarter. The Director shall maintain a list of those activities which may and may not be counted towards this requirement.
- 4.2 Each licensed operator and senior reactor operator shall demonstrate an ability to conduct a variety of reactivity manipulations during the course of the school year. A minimum of 10 reactivity manipulations shall be completed during each school year (i.e., 20 each requalification cycle). The Director shall maintain a list of those operations which qualify towards meeting this requirement.
- 4.3 Each Reactor Operator and Senior Reactor Operator shall be responsible for maintaining records, in a format approved by the Director, to verify compliance with sections 4.1. and 4.2. Operator records will be reviewed by the director (or designate) at regular intervals to ensure all operators comply with sections 4.1 and 4.2.

5.0 OBSERVATION

- 5.1 Reactor administration, supervisory, training, and/or health physics personnel shall conduct periodic observations of the performance and competency of licensed Reactor Operators and Senior Reactor Operators during routinely scheduled operations. These observations should normally be unannounced and shall be documented.
- 5.2 Documented observation of each operator shall occur at least once each year.

6.0 EVALUATION

- 6.1 A comprehensive written exam shall be administered during each requalification cycle to each Reactor Operator and Senior Reactor Operator (one exam every two years). An operating exam shall be administered each academic year to each Reactor Operator and Senior Reactor Operator. The results of the exams will be used to determine the areas in which retraining is needed to upgrade licensed operator and senior operator knowledge.
- 6.2 The written exam(s) shall be prepared by the Director or a Senior Reactor Operator assigned by the Director. The person who prepares the exam will be exempt from taking the exam during that requalification cycle; preferably this is someone who is exempt under section 6.5 below. The same person shall not be exempted for two consecutive cycles.
- 6.3 All written examinations shall be administered on the same day and the exam shall be proctored. If any RO or SRO misses the exam, a different exam shall be administered to that person.

- 6.4 The operating exam shall be administered by a Senior Reactor Operator assigned by the Director. This may be in conjunction with the operator observation required by section 5.0.
- 6.5 The Senior Reactor Operator exam administered by the NRC shall suffice to satisfy the requalification cycle exam requirement.

7.0 ACCELERATED REQUALIFICATION PROGRAM

- 7.1 Any Reactor Operator or Senior Reactor Operator who in the opinion of the Director, is clearly deficient in operating knowledge or skills shall not operate the reactor except under the direct supervision of a Senior Reactor Operator until completion of an Accelerated Requalification Program.
- 7.2 Any operator who achieves a score of at least 70% on each section of the written exam AND at least 70% on the operating exam required by ¶6.1 may continue to operate the reactor. Any operator who achieves a score less than 70% on any section of the written exam OR less than 70% on the operating exam shall not operate the reactor except under the direct supervision of a Senior Reactor Operator until completion of Accelerated Requalification Program.
- 7.3 The content of any Accelerated Requalification Program shall be determined on a case-by-case basis by the Director in consultation with the operator, and shall be documented prior to initiation. It may include, but need not be limited to, attending or presenting lectures on the areas of weakness, revising facility documentation, individual or group study sessions, or tutorials.
- 7.4 Successful completion of the Accelerated Retraining Program shall be based on the passing of an additional exam. This exam shall be administered within six months of the date of the original requalification exam. The extent of this additional exam will normally be limited to areas of identified weakness. The examination may be oral or operational. The type of exam used should be determined at the start of the Accelerated Retraining program.

8.0 OTHER REQUIREMENTS

- 8.1 Each operator is required to satisfactorily complete a physical exam every 24 months. If any operator has a significant permanent change in their physical condition that may affect their ability to perform licensed duties, they must inform the Director immediately.
- 8.2 NRC operator licenses expire 6 years from their effective date.

9.0 RECORDS

- 9.1 Originals of all records relating to the requalification requirements in this Plan shall be retained by the facility. Copies shall be provided to the RO or SRO at their request.