

UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR REACTOR REGULATION
WASHINGTON, D.C. 20555-0001

October 1, 1998

NRC INFORMATION NOTICE 98-37: ELIGIBILITY OF OPERATOR LICENSE APPLICANTS

Addresses

All holders of operating licenses for nuclear power reactors, except those who have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel.

Purpose

The U. S. Nuclear Regulatory Commission (NRC) is issuing this information notice to remind addressees that the eligibility requirements for applying for an operator license have not changed since 10 CFR Part 55 was amended in 1987. Recently, the NRC staff denied some applications for senior reactor operator licenses because the applicants did not have the necessary responsible nuclear power plant experience at the plant for which the applicant was seeking a license. It is expected that recipients will review the information in this notice to avoid similar problems. However, suggestions made in this information notice are not NRC requirements; therefore, no specific action or written response is required.

Background

10 CFR 55.31(a)(4), requires that (1) operator license applicants submit evidence that they have successfully completed a facility licensee's requirements to be licensed as an operator and (2) an authorized representative of the facility licensee certify successful completion of the requirements on NRC Form 398, "Personal Qualification Statement - Licensee." In lieu of this evidence, 10 CFR 55.31(a)(4) provides that the Commission may accept certification that the applicant has successfully completed a Commission-approved training program that is based on a systems approach to training (SAT) and that uses a simulation facility acceptable to the Commission.

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The NRC discussed revised applicant eligibility criteria in a March 28, 1980 letter from Harold Denton to all nuclear power plant licensees. In that letter, licensees were informed of the revised criteria that the NRC staff would use in evaluating reactor operator training and licensing. These criteria included classroom training and simulator training and that a candidate spend a specified amount of time on shift under instruction and to have, in the case of a senior operator, previous responsible power plant experience, a portion of which must be at the plant for which the license is sought, and a four-year college degree or one year as a reactor operator. On October 31, 1980, the March 28, 1980 letter was reproduced in NUREG-0737 "Clarification of TMI Action Plan Requirements," as Section I.A.2.1, "Immediate Upgrading of Reactor Operator and Senior Reactor Operator Training and Qualifications." Section I.A.2.1 restated the criteria that a senior reactor operator applicant must have been licensed as a reactor operator for a minimum of one year before obtaining a senior operator license. Section I.A.2.1 further stated that applicants for a senior license were expected to have a minimum of four years of "responsible power plant experience" and defined responsible power plant experience as "that obtained as a control room operator (fossil or nuclear) or as a power plant staff engineer involved in the day-to-day activities of the facility, commencing with the final year of construction."

On February 7, 1985, the Commission published a policy statement on training and qualification, which endorsed the industry-wide accreditation process while affirming the NRC's responsibility for evaluating licensees' training efforts. The accreditation process was endorsed by the Commission based on the strength of the SAT process in maintaining the training program content and because the accreditation guidance for licensed operator training programs established recommended qualifications, including experience, for licensed control room operators, senior control room operators, and shift supervisors that were consistent with the experience requirements contained in the 1980 Denton letter.

In 1987, 10 CFR Part 55, was amended to codify the Commission's policy related to operator training. Concurrent with publication of the Part 55 rule change, the staff published Revision 2 to Regulatory Guide 1.8, "Personnel Selection and Training," and endorsed ANSI/ANS-3.1-1981, with exceptions. Regulatory Guide 1.8 defined a method acceptable to the NRC for compliance with regulations regarding training and qualification of nuclear power plant personnel. The endorsement and exceptions reiterated the NRC's position on the experience needed by operator and senior reactor operator applicants, previously stated in the 1980 Denton letter and in NUREG-0737.

Description of Circumstances

Recently the NRC staff denied some applications for senior reactor operator licenses because the applicants did not have the necessary responsible power plant experience. These applicants had completed the licensee's training program but did not have six months of responsible nuclear power plant experience at the plants for which the applicants were seeking a license.

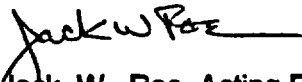
Discussion

The 1987 amendment to 10 CFR Part 55 provided that applicants would no longer need to provide details of their training and experience on the application if they certified that they had completed a Commission-approved training program that used a simulation facility acceptable to the NRC under 55.45(b). Additionally, the Statement of Considerations (SOC) accompanying the rule change stated that a facility licensee's training program would be approved by being accredited by the National Nuclear Accrediting Board. At the time of the publication of the Part 55 rule change, the experience recommendations in the industry's accredited licensed operator training program guidelines were considered to be equivalent to the experience criteria of Regulatory Guide 1.8, Revision 2. Therefore, when 10 CFR 55.31(a)(4) was promulgated, an accredited training program, based on an SAT process, together with the specific experience criteria contained in the training program accreditation guidelines at that time, was an acceptable alternative method for complying with the Commission's regulations on training and qualification of nuclear power plant workers. The SOC accompanying the 1987 revision also informed licensees that their training programs and experience criteria must conform to the Commission-approved baseline as these were reflected in the industry's accreditation standards at the time of the revision.

While the Commission-approved experience baseline for licensed operators has not changed since the 1980 Denton letter, the National Academy for Nuclear Training modified its accredited licensed operator training program guidelines in 1991 by removing certain criteria integral to the NRC's endorsement of that accreditation as an acceptable means of meeting the requirements in 10 CFR Part 55. Some facility licensees interpreted the removal of these criteria from the industry guidelines as NRC approval to reduce the training and experience requirements for operator license applicants and modified their training programs and procedures accordingly. To rectify the unintended interpretation by many facility licensees as a result of the modified industry guidelines, the National Academy for Nuclear Training developed interim guidance which reinstates the industry guidance that was removed in 1991. This interim guidance was sent to its membership on July 8, 1998.

Many licensees are in the process of upgrading (amending) their facility licensing basis documents, including the technical specifications, prior to submitting them to the NRC staff for approval. The NRC staff will review submittals which contain references to licensed operator eligibility requirements against the Commission-approved experience baseline referenced in this information notice; however, licensees may propose means other than those specified in the baseline criteria for meeting applicable regulations.

This information notice requires no specific action or written response. If you have any questions about the information in this notice, please contact one of the technical contacts listed below or the appropriate Office of Nuclear Reactor Regulation (NRR) project manager.


Jack W. Roe, Acting Director
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

Technical contacts:	Richard Pelton, NRR 301-415-1028 E-mail: rmp1@nrc.gov	John Pellet, Region IV 817-860-8159 E-Mail: jlp@nrc.gov
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LIST OF RECENTLY ISSUED
NRC INFORMATION NOTICES

Information Notice No.	Subject	Date of Issuance	Issued to
98-37	Inadequate or Poorly Controlled Non-Safety-Related Maintenance Activities Unnecessarily Challenged Safety Systems	9/18/98	All holders of operating licenses for nuclear power reactors.
98-35	Threat Assessments and Consideration of Heightened Physical Protection Measures	9/4/98	All U.S. NRC fuel cycle facilities power and non-power reactor licences (Safeguard issues, not for public disclosure.)
98-34	NRC Configuration Control Errors	8/28/98	All holders of Operating licenses for nuclear power reactors, except for those who have ceased operations and have certified that fuel has been permanently removed from the reactor vessel
98-33	NRC Regulations Prohibit Agreements that restrict or Discourage an Employee from Participating in Protected Activities	8/28/98	All holders of a U.S. Nuclear Regulatory Commission (NRC) license.
98-32	Problems Associated with Post-Fire Safe-Shutdown Circuit Analyses	8/26/98	All holders of operating licenses for nuclear power reactors, except those who have permanently ceased operations and have certified that fuel has been permanently removed from the reactor

OL = Operating License
CP = Construction Permit

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