

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

August 15, 1995

NRC GENERIC LETTER 95-06: CHANGES IN THE OPERATOR LICENSING PROGRAM

Addressees

All holders of operating licenses (except those licenses that have been amended to a possession only status) or construction permits for nuclear power reactors.

Purpose

The U.S. Nuclear Regulatory Commission (NRC) is issuing this generic letter to (1) notify addressees of NRC's intent to change the operator licensing process so that facility licensees will have the option to prepare draft written examinations and operating tests used by the NRC to determine the competence of operator license applicants at power reactor facilities and (2) to solicit volunteers to participate in a pilot program that will evaluate and refine the new examination development process.

Background

On March 24, 1995, the staff informed the Commission of its intent to revise the manner in which the NRC administers the initial operator licensing program to allow greater participation by facility licensees and the elimination of contractor assistance in this area. On April 18, 1995, the Commission consented to the staff's proposal to initiate a transition process to revise the operator licensing program and directed the staff to carefully consider experience from the pilot examinations before full implementation.

Description of Circumstances

Part 55, "Operators' Licenses," of Title 10 of the *Code of Federal Regulations* (10 CFR Part 55) establishes the Commission's procedures and criteria for issuing licenses to operators and senior operators. Part 55 states the minimum training and educational requirements for applying for a license, the content requirements for licensing examinations, and the process for making a license application; however, it does not define the specific process for conducting licensing examinations. Specific guidance in this area is given in NUREG-1021, "Operator Licensing Examiner Standards," which includes the procedures that NRC staff examiners and NRC-certified contract examiners use to prepare and conduct both the written and operating portions of the licensing examinations. The role of the facility licensees has historically been limited to reviewing and validating the NRC-prepared examinations before they are given, and to providing administrative and logistical support to the NRC and contract examiners while the examinations are in progress.

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The staff now intends to revise the initial operator licensing program to permit facility licensees to draft and, in part, conduct initial licensing examinations with NRC oversight. NRC participation in the examinations will range from conducting part to all of the examination. This change is expected to result in significant resource savings because facility employees, who are more familiar with their plant and its procedures, will be able to develop the examinations more efficiently than NRC or contract examiners. The change is part of the NRC's continuing effort to streamline the functions of the Federal Government consistent with Administration initiatives and to accommodate anticipated resource reductions. The pilot program described herein will evaluate and refine the proposed examination process to ensure that acceptable levels of effectiveness, objectivity, and independence are maintained.

Discussion

The staff has historically determined the level of knowledge and abilities of applicants for operator licenses at power reactor facilities by conducting examinations developed fully by the NRC. This approach has been appropriate to meet the requirement of Section 107 of the Atomic Energy Act of 1954, as amended, to prescribe uniform conditions for licensing individuals and to provide an appropriate independent assessment of an applicant's qualifications to be licensed. During the period from the 1950s to the mid-1980s, the amount of training provided to license applicants and the facility licensees' focus on training varied considerably. During the mid- to late-1980s, the industry's emphasis in the training area increased significantly, and all power reactor licensees established formal training programs that have been accredited by the National Academy for Nuclear Training.

In 1987, the NRC amended 10 CFR Part 55 to establish detailed criteria for implementing licensed operator requalification programs and to require each licensed operator to pass an NRC-conducted requalification examination as a condition for license renewal. After conducting requalification examinations for more than five years, the NRC concluded that the industry had established a high standard of performance in the requalification area and that the NRC was largely duplicating the licensees' efforts. Therefore, in 1994, the NRC amended 10 CFR Part 55 to remove the requirement for every operator to pass an NRC-conducted requalification examination so the staff could shift its involvement in the requalification area to one of inspection oversight.

The improvements in operator training and performance that prompted the NRC to reduce its level of involvement in the requalification program have also been evident in the initial operator licensing process. That fact, in conjunction with the aforementioned streamlining initiative, has motivated the NRC to reconsider its approach to the initial operator licensing examination program. The NRC now intends to change the guidance in NUREG-1021 to permit facility licensees to draft the written examinations and operating tests for operator and senior operator license applicants. The NRC will review and approve the licensees' proposed examinations and tests and independently conduct the operating tests. Facility licensees will not conduct any portion of the operating tests, however, they will conduct the written examinations. The NRC

will review the graded written examinations, grade each applicant's operating test performance, make the final pass or fail decisions, and issue licenses, as appropriate.

From October 1995 through March 1996, the staff intends to conduct a voluntary pilot program to evaluate and refine the proposed examination process; other potential examination efficiencies may also be evaluated during the pilot period. The NRC regional offices will be contacting those facility licensees who have requested initial operator license examinations during the pilot period to discuss the details of the program and to ascertain the licensees' willingness to participate. As usual, the regional office will confirm the examination arrangements in a corporate notification letter.

To maintain uniform standards of examination format, difficulty, and integrity, the staff will expect participants in the pilot program to prepare the written examinations and operating tests in accordance with the existing procedures and guidelines in Revision 7 of NUREG-1021, Revision 5 of NUREG/BR-0122 ("Examiners' Handbook for Developing Operator Licensing Written Examinations"), and the supplementary instructions outlined in Attachment 1. Departure from the stated guidelines may result in examination delays if the NRC has to rewrite the examinations.

Lessons learned during the pilot examinations will be incorporated in Revision 8 of NUREG-1021. The staff will make a draft copy of the revised report available for industry and public comment before it is implemented on a generic basis. The NRC intends to formally implement the facility-developed examination option in October 1996, contingent upon successful pilot examination experience and Commission approval.

Voluntary Response Requested

Those addressees who are scheduled for initial operator licensing examinations during the pilot period (October 1995 through March 1996) and are interested in participating in the program described herein should contact their NRC Regional Office to make the necessary arrangements.

Backfit Discussion

This generic letter requires no specific action or written response. The addressee's decision to participate in the pilot program is strictly voluntary. Therefore, the staff has not performed a backfit analysis. Formal implementation of the revised examination process may require a backfit analysis.

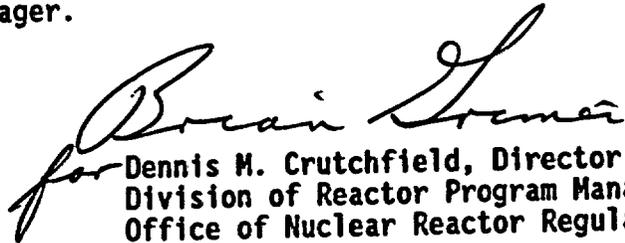
Federal Register Notification

A notice of opportunity for public comment was not published in the *Federal Register* because of the voluntary nature of the pilot program. However,

comments on the issues addressed by this generic letter may be sent to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555-0001.

The staff intends to publish a notice of opportunity for public comment before issuing the revised examination procedures in Revision 8 of NUREG-1021.

If you have any questions about this matter, please contact one of the technical contacts listed below or the appropriate Office of Nuclear Reactor Regulation (NRR) project manager.


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Attachments:

1. Pilot Examination Guidelines
2. List of Recently Issued NRC Generic Letters

Attachments filed in Jacket

PILOT EXAMINATION GUIDELINES

Facility licensees will prepare the written examinations and operating tests (dynamic simulator and walkthrough) in accordance with the instructions in Revision 7 of NUREG-1021 ("Operator Licensing Examiner Standards") and Revision 5 of NUREG/BR-0122 ("Examiners' Handbook for Developing Operator Licensing Written Examinations"), subject to the following additional criteria:

- (1) The facility licensee will prepare an integrated examination outline (written and operating test) and submit it to the NRC regional office for review, comment, and approval at least 60 days before the scheduled examination date. The NRC chief examiner will work with the facility licensee to resolve any problems and to avoid unnecessary revision of the final examination products.
- (2) Facility employees who are involved with developing the examinations and tests will sign a standard security agreement (Form ES-201-2) before they gain specific knowledge of the examinations and tests. Facility employees who played a substantial role in training the license applicants will generally not be involved in developing the license examinations or tests. If the facility licensee considers such employees necessary for developing the examinations or tests, it will define the process it will use to ensure that the integrity of the examinations is not compromised and discuss the process with the NRC chief examiner.
- (3) The written examinations and operating tests will satisfy the following specific criteria:
 - A maximum of 50 percent of the written examination questions may be taken directly from the facility question bank; up to an additional 40 percent of the questions may be taken from the facility bank but must be significantly modified; and a minimum of 10 percent of the questions will be newly developed. As discussed in NUREG/BR-0122, new questions should emphasize the applicants' understanding at the comprehension or application levels of knowledge because they have the greatest operational and discriminatory validity.
 - No more than 25 percent of the questions on the examination may be repeated from examinations, quizzes, or tests administered to the license applicants during their license training class, or from the past two NRC license examinations at the facility. No questions may be drawn directly from the applicants' audit examination or similar testing vehicle given at the end of the license training class.

- Each walkthrough test will include at least two job performance measures (JPMs) that are either new or significantly altered, and each simulator scenario set will include at least one new or significantly altered scenario. Other scenarios used may be drawn directly from the facility scenario bank; however, they will be altered to the degree needed to prevent the applicants from immediately recognizing the scenarios based on initial conditions or other cues.
 - A significant modification, for purposes of the written questions, means a change to the conditions in the stem and at least one distractor significantly changed. Similarly, JPMs and simulator scenarios will have at least one substantive event or condition change that alters the course of action in the JPM or scenario.
- (4) The facility licensee will submit the final written examinations and operating tests to the NRC regional office at least 30 days before the scheduled examination date. In its submittal, the facility licensee will include a history (e.g., bank, revised, new, and date last used) of each test item used on the written and operating tests.
- (5) The NRC regional office will assign a chief examiner to coordinate the review, revision (as determined necessary by the NRC), and validation of the written examinations and operating tests with the facility licensee. Additional NRC staff examiners will be assigned as necessary (typically one or two, depending on the number of applicants) to assist the chief examiner with administering and grading the operating tests in accordance with existing procedures. The facility licensee will administer and grade the written examinations; NRC examiners will review and approve the licensee's grading.

LIST OF RECENTLY ISSUED GENERIC LETTERS

<u>Generic Letter</u>	<u>Subject</u>	<u>Date of Issuance</u>	<u>Issued To</u>
95-05	VOLTAGE-BASED REPAIR CRITERIA FOR WESTINGHOUSE STEAM GENERATOR TUBES AFFECTED BY OUTSIDE DIAMETER STRESS CORROSION CRACKING	08/03/95	ALL HOLDERS OF OLs OR CPs FOR PRESSURIZED WATER REACTORS (PWRs).
92-01, REV. 1, SUPP. 1	REACTOR VESSEL STRUCTURAL INTEGRITY	05/19/95	ALL HOLDERS OF OLs (EXCEPT THOSE LICENSES THAT HAVE BEEN AMENDED TO POSSESSION-ONLY STATUS) OR CONSTRUCTION PERMITS FOR NUCLEAR POWER REACTORS.
95-04	FINAL DISPOSITION OF THE SYSTEMATIC EVALUATION PROGRAM LESSONS-LEARNED ISSUES	04/28/95	ALL HOLDERS OF OLs OR CPs FOR NUCLEAR POWER REACTORS.
95-03	CIRCUMFERENTIAL CRACKING OF STEAM GENERATOR TUBES	04/28/95	ALL HOLDERS OF OLs OR CPs FOR PRESSURIZED WATER REACTORS (PWRs).
95-02	USE OF NUMARC/EPRI REPORT TR-102348, "GUIDELINE ON LICENSING DIGITAL UPGRADES," IN DETERMINING THE ACCEPTABILITY OF PERFORMING ANALOG-TO-DIGITAL REPLACEMENTS UNDER 10 CFR 50.59	04/26/95	ALL HOLDERS OF OLs OR CPs FOR NUCLEAR POWER REACTORS.
89-04, SUPP. 1	GUIDANCE ON DEVELOPING ACCEPTABLE INSERVICE TESTING PROGRAMS	04/04/95	ALL HOLDERS OF OLs OR CPs FOR NUCLEAR POWER REACTORS.

OL = OPERATING LICENSE
CP = CONSTRUCTION PERMIT
NPR = NUCLEAR POWER REACTORS

comments on the issues addressed by this generic letter may be sent to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555-0001.

The staff intends to publish a notice of opportunity for public comment before issuing the revised examination procedures in Revision 8 of NUREG-1021.

If you have any questions about this matter, please contact one of the technical contacts listed below or the appropriate Office of Nuclear Reactor Regulation (NRR) project manager.

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