



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

CF Only

April 26, 1984

TO ALL APPLICANTS FOR AN OPERATING LICENSE

Gentlemen:

Subject: Administration of Operating Tests Prior to Initial Criticality
(10 CFR §55.25) (Generic Letter No. 84-10)

This letter is to inform you that all applicants for Reactor Operator (RO) and Senior Reactor Operator (SRO) licenses at facilities prior to initial criticality who have not had extensive actual operating experience at a comparable facility must obtain an exemption to 10 CFR §55.25(b) if they meet the conditions discussed below pending completion of NRC rulemaking effort identified below.

On April 13, 1984, the Commission met to consider the existing staff practice of allowing satisfactory completion of an approved cold license training program as meeting the 10 CFR §55.25(b) requirement for extensive actual operating experience at a comparable facility. They determined that additional rule-making action was required to clarify the Commission position that satisfactory completion of NRC-approved training programs could be substituted for experience requirements. They directed the Office of the General Counsel to initiate a rulemaking to make 10 CFR §55.25(b) fully consistent with current staff practice. They also affirmed that operator licenses in effect will remain valid.

For future operator licensing actions pending Commission action on the revised rule, the Commission authorized the staff to grant exemptions to the requirements of §55.25(b) for those individuals who have completed an approved cold license training program for their facility. The program must have included: (a) nuclear fundamentals, including ten reactor startups at a nuclear reactor, (b) observation training on shift at a comparable operating reactor, (c) training on a simulator and (d) training on actual system design of the candidate's plant.

No specific exemption request is needed for individuals who have completed a cold license training program that includes all elements. The necessary exemption will be granted as part of the issuance of the operator's license, provided that our records clearly indicate satisfactory completion of a program containing the above elements. Accordingly, until 10 CFR §55.25(b) is modified as discussed above, applicants should identify those cold license candidates who satisfy the foregoing criteria. For candidates whose application is presently before the Commission, a list of those who satisfy the criteria should be furnished promptly to avoid unnecessary delays. For future candidates, this information should be provided along with the individual applications.

Specific exemption requests for individuals who have completed cold license training programs that did not include all elements identified above are necessary and shall be evaluated on a case-by-case basis in accordance with

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TO ALL POWER REACTOR LICENSEES AND APPLICANTS FOR AN OPERATING LICENSE

Gentlemen:

Subject: Administration of Operating Tests Prior to Initial Criticality
(10 CFR §55.25)

This letter is to inform you that all applicants for Reactor Operator (RO) and Senior Reactor Operator (SRO) licenses at facilities prior to initial criticality who have not had extensive actual operating experience at a comparable facility must be granted an exemption to 10 CFR §55.25(b) pending completion of NRC rulemaking effort identified below.

On April 13, 1984, the Commission met to consider the existing staff practice of allowing satisfactory completion of an approved cold license training program as meeting the 10 CFR §55.25(b) requirement for extensive actual operating experience at a comparable facility. They determined that additional rulemaking action was required to clarify the Commission position that satisfactory completion of NRC approved training programs could be substituted for experience requirements. They directed the Office of the General Counsel to initiate a rulemaking to make 10 CFR §55.25(b) fully consistent with current staff practice. They also affirmed that operator licenses in effect will remain valid.

For future licensing actions pending Commission action on the revised rule, the Commission authorized the staff to grant exemptions to the requirements of §55.25(b) for those individuals who have completed an approved cold license training program for their facility. The program must have included: (a) nuclear fundamentals, including ten reactivity manipulations at a nuclear reactor, (b) observation training on shift at a comparable operating reactor, (c) training on a simulator and (d) training on actual system design of the candidate's plant. For candidates who are eligible to be licensed based on the completion of a training program (e.g., cold license candidates and instant SRO's at operating plants) an exemption must be granted.

No specific exemption request is needed for individuals who have completed a cold license training program that includes all elements. Exemption requests for individuals who have completed cold license training programs that did not include all elements identified above must be specifically requested and shall be evaluated on a case-by-case basis in accordance with the provision of 10 CFR §55.7. If you have any questions concerning this matter, please contact Don Beckham, Chief, Operator Licensing Branch or Ed Christenbury, Office of the Executive Legal Director.

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

DW/OPERATING TESTS/TED1

OFFICE	OLB/DHES	DD/DHFS	D/DHES	OELD	ORB/DL	DD/DL	D/DL
SURNAME	REaton	WRussell	HThompson	EChristenbury	GHolahan	RPurple	DEisenhut
DATE	4/17/84	4/17/84	4/17/84	4/17/84	4/17/84	4/ /84	4/ /84