

June 27, 1984

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TO ALL LICENSEES OF OPERATING REACTORS, APPLICANTS FOR OPERATING  
LICENSE, AND HOLDERS OF CONSTRUCTION PERMITS

Gentlemen:

SUBJECT: ADEQUACY OF ON-SHIFT OPERATING EXPERIENCE FOR  
NEAR TERM OPERATING LICENSE APPLICANTS  
(Generic Letter 84-16)

On June 14, 1984, the Chairman of the U. S. Nuclear Regulatory Commission, N. J. Palladino, sent J. H. Miller, President, Georgia Power Company, a letter in which the Commissioners presented their views on the subject of adequacy of on-shift operating experience for near-term operating license applicants. This letter is enclosed and is applicable for near-term operating license applicants.

The June 14, 1984 letter accepted, with some clarifications, an Industry Working Group proposal on this subject, presented to the Commission on February 24, 1984. Commissioners Gilinsky and Asselstine expressed individual views on the subject. In accordance with the Chairman's letter, March 31, 1985, is the latest date for use of shift advisors. Beyond that date, utilities should plan to have sufficient operating experience on-shift such that there no longer is a need to rely on the use of shift advisors. We understand, of course, that circumstances may arise, beyond the control of the utility, which would mandate the use of advisors to cover one or more shifts, but these circumstances can be treated on a case-by-case basis.

The acceptance of these experience requirements by the NRC does not alter the guidance for eligibility, included in Regulatory Guide 1.8 and NUREG-0737, for RO and SRO licensing examination candidates. Further, acceptance of the Industry Working Group proposal does not foreclose the development of any long term requirements for crew operating experience.

We understand that each utility is in possession of a copy of the Industry Working Group proposal of February 24, 1984. Copies are also available from the NRC Public Document Room.

This letter contains no reporting requirement and is for information only.

Sincerely,

Original signed by  
Robert A. Purple

*for* Darrell G. Eisenhut, Director  
Division of Licensing

Enclosure:  
Ltr of June 14, 1984

\*PREVIOUS CONCURRENCE SEE DATE

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June 27, 1984

TO ALL LICENSEES OF OPERATING REACTORS, APPLICANTS FOR OPERATING  
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(Generic Letter 84- )

On June 14, 1984, the Chairman of the U. S. Nuclear Regulatory Commission, N. J. Palladino, sent J. H. Miller, President, Georgia Power Company, a letter in which the Commissioners presented their views on the subject of adequacy of on-shift operating experience for near-term operating license applicants. This letter is enclosed and is applicable for near-term operating license applicants.

The June 14, 1984 letter accepted, with some clarifications, an Industry Working Group proposal on this subject, presented to the Commission on February 24, 1984. Commissioners Gilinsky and Asselstine expressed individual views on the subject. In the Chairman's letter, March 31, 1985 is presented as an acceptable date beyond which utilities should plan to have sufficient operating experience on-shift such that there no longer is a need to rely on the use of shift advisors. We understand, of course, that circumstances may arise, beyond the control of the utility, which would mandate the use of advisors to cover one or more shifts, but these circumstances can be treated on a case-by-case basis.

The acceptance of these experience requirements by the NRC does not alter the guidance for eligibility, included in Regulatory Guide 1.8 and NUREG-0737, for RO and SRO licensing examination candidates. Further, acceptance of the Industry Working Group proposal does not foreclose the development of any long term requirements for crew operating experience.

We understand that each utility is in possession of a copy of the Industry Working Group proposal of February 24, 1984. Copies are also available from the NRC Public Document Room.

This letter contains no reporting requirement and is for information only.

Sincerely,

Darrell G. Eisenhut, Director  
Division of Licensing

Enclosure:  
Ltr of June 14, 1984

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June 27, 84

TO ALL LICENSEES OF OPERATING REACTORS, APPLICANTS FOR OPERATING  
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Gentlemen:

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NEAR TERM OPERATING LICENSE APPLICANTS  
(Generic Letter 84- )

On June 14, 1984, the Chairman of the U. S. Nuclear Regulatory Commission, N. J. Palladino, sent J. H. Miller, President, Georgia Power Company, a letter in which the Commissioners presented their views on the subject of adequacy of on-shift operating experience for near-term operating license applicants. We believe the information contained in this letter to be informative and should be forwarded to all interested parties, thus we are sending this letter to you. This letter is enclosed.

The June 14, 1984 letter is in response to an Industry Working Group proposal on this subject, presented to the Commission on February 24, 1984. Specifically, note the varied opinions on the guidance as expressed by the individual views of Commissioners Gilinsky and Asselstine. However, the Commission believes that the industry proposal with the given clarifications will provide reasonable assurance of adequate on-shift operating experience pending any further rulemaking the Commission might choose to undertake.

The acceptance of these experience requirements by the NRC does not alter the guidance for eligibility, included in Regulatory Guide 1.8 and NUREG-0737, for RO and SRO licensing examination candidates. Further, acceptance of this proposal is not intended to foreclose any long term requirements for crew operating experience which the staff may develop for Commission consideration that would apply to operating plants.

We understand that each utility is in possession of a copy of the Industry Working Group proposal of February 24, 1984. Copies are also available from the NRC Public Document Room.

This letter contains no reporting requirement and is for information only.

Sincerely,

Darrell G. Eisenhut, Director  
Division of Licensing

Enclosure:

Ltr of June 14, 1984

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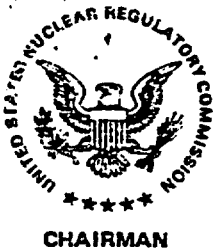
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as modified



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

June 14, 1984

CHAIRMAN

Mr. J. H. Miller, President  
Georgia Power Company  
P. O. Box 4545  
Atlanta, Georgia 30302

Dear Mr. Miller:

The Commission appreciates the efforts you and the other members of the Industry Working Group put forth in developing the proposal you presented to us on February 24, 1984, to assure the adequacy of on-shift operating experience for near-term operating license applicants. The level of utility participation in developing and supporting this proposal clearly reflects the needed degree of involvement by senior utility management to assure sound implementation.

The industry proposal recognizes that the use of shift advisors to supplement plant experience depends upon the adequacy of the training of advisors and their integration into the shift crew. It is particularly important where advisors are used that there is a management commitment to (1) provide plant specific training for shift advisors which includes plant procedures, technical specifications, plant systems, and where available, time for use of a plant simulator, and (2) training for the remainder of the shift crew on the role of advisors. Furthermore, the industry proposal recognizes the desirability of phasing out the use of shift advisors as soon as is practically achievable, but proposed no specific date for terminating the use of advisors.

The Commission accepts the Industry Working Group proposal with the following clarifications:

With regard to the shift crews that meet the industry experience proposal:

1. The Hot Participation Experience tabulated in your slide 5 should be at a large, same type plant.
2. The use of an SRO-licensed STA to satisfy the Hot Participation Experience is acceptable provided that the STA serves as a member of the shift.

With regard to the use of shift advisors:

1. The shift advisors that have at least one year on shift as a licensed SRO at an operating plant of the same type are acceptable. Proposals to utilize an individual as an advisor who has only an RO license will be evaluated on a case-by-case basis to assure that an appropriate level of knowledge and supervisory experience has been accumulated.
2. The utility-administered examinations for advisors should include both oral and written examinations. If no plant-reference simulator is available, a board of at least three individuals, qualified at the SRO level, should conduct the oral examination.
3. The utility should provide the NRC with a list of certified advisors and their qualifications. The NRC staff should be notified one month prior to their release from the plant to which they are assigned.

Based upon operating experience, information submitted by individual utilities since the February 24, 1984 meeting, it appears that use of shift advisors may be required only at one plant now anticipating fuel load after March of 1985. Further, we understand that this utility is making plans to obtain necessary operating experience for its licensed operators prior to fuel load. Accordingly, it appears that March 31, 1985 would be an acceptable date beyond which utilities should plan to have sufficient operating experience on shift such that there no longer is a need to rely on the use of shift advisors. We understand, of course, that circumstances may arise, beyond the control of the utility, which would mandate the use of advisors to cover one or more shifts, but these circumstances can be treated on a case-by-case basis.

The Commission believes that the industry proposal with the above clarifications will provide reasonable assurance of adequate on-shift operating experience pending any further rulemaking the Commission might choose to complete. The Commission is therefore issuing a generic letter to all licensees which outlines this policy. The acceptance of these experience requirements by the NRC does not alter the guidance for eligibility, included in Regulatory Guide 1.8 and NUREG-0737, for RO and SRO licensing examination candidates. Further, acceptance of this proposal is not intended to foreclose any long term

requirements for crew operating experience which the staff may develop for Commission consideration that would apply to operating plants.

Commissioner Asselstine adds:

I disagree with two aspects of the Commission's decision on the matter of shift experience requirements. first, I do not believe that the "hot participation experience" element in the industry proposal is adequate. I would only eliminate the requirement for a shift advisor if one licensed senior reactor operator on the shift has at least one year's prior experience as a licensed SRO at a similar plant. Without at least that amount of prior operating experience on the part of the shift crew, it seems prudent to me to require a shift advisor with that level of experience. Second, I believe that the matter of shift experience requirements should not be handled by means of a generic letter but rather should be the subject of a Commission policy statement. In my view, the Commission should have prepared a proposed policy statement on the subject and should have sought industry and public comment on it.

Commissioner Gilinsky adds:

Every recipient of this letter should understand its full implications. In pressuring the Commission to accept a feeble approach toward shift experience requirements at a few plants nearing operation, the industry is jeopardizing its long standing safety record. I do not think I have to underline what that means.

I would remind you that the original NRC staff proposal -- that at least one member of a shift have one year of previous licensed operating experience -- was very modest, as any experienced shift supervisor will tell you. It is also feasible -- I have attached an NRC staff memorandum on the number of experienced operators available. The suggestion that it is sufficient for the most senior person on shift to have six months of "hot participation", of which only six weeks need be at power, is simply ridiculous. The Commissioners who approved this approach may not realize what they have done, but you do. It says to me the industry is not yet capable of policing its members.

Mr. J. H. Miller

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I do not agree with the way the advisor issue is being handled, in particular the decision of the Commission not to require that advisors pass the equivalent of the two-day NRC SRO examination. I am not at all impressed by the two hour quiz administered by the utility seeking an operating permit. There are cases, and this is one of them, where going half-way is worse than doing nothing. Rather than have advisors whose knowledge of the plant is in question, it would be better to have no advisors at all. Inexperienced supervisors may well disregard their training to follow the advice of an advisor installed by the NRC. If the advisor does not know the plant specifications and limitations, we could get into serious trouble.

Finally, the Commission's disregard of its existing regulation on operator experience at new plants, 10 CFR 55.25(b), and its General Counsel's advice on that point, does not encourage respect for the system of safety regulation. Neither does the Commission's promulgation of a major policy decision by means of an informal letter which three Commissioners voted ~~not~~ to discuss in public.

Thank you again for your efforts toward resolving this issue.

Sincerely,



Nunzio J. Palladino

Enclosure:  
Memo dtd. 3/8/84  
from W.J. Dircks  
to Cmr. Gilinsky  
(per Cmr. Gilinsky's  
additional views)



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

MAR 3 1984

Attached per Commissioner  
Gilinsky's added comments

*Vic*  
MEMORANDUM FOR: ~~Commissioner~~ Gilinsky  
FROM: William J. Dircks  
Executive Director for Operations  
SUBJECT: LICENSED OPERATOR POOL

The staff has developed the enclosed responses to the questions you asked in your March 2, 1984, memorandum. The responses include our best estimate from information in the Operator Licensing Tracking System (OLTS).

*WJD*  
William J. Dircks  
Executive Director for Operations

Enclosure:  
As Stated

cc: Chairman Falladino  
Commissioner Roberts  
Commissioner Asselstine  
Commissioner Bernthal  
OGC  
OPE  
SECY



RESPONSES TO  
COMMISSIONER GILINSKY'S QUESTIONS  
ON LICENSED OPERATOR POOLS

1. How many Senior Reactor Operator (SRO) licenses have been issued in the history of the NRC?

Response

It is not possible to determine exactly how many SRO or RO licenses have been issued in the history of NRC. The Operator Licensing Tracking System (OLTS) was not initiated until 1982. Hard copy files were used before OLTS. The Privacy Act requires that record retention periods be established and maintained. Since the four year retention period for some of the earlier licenses has elapsed, the hard copy files of inactive operators were destroyed or purged of information prior to initiation of OLTS. These files cannot be recovered.

The totals that are indicated in OLTS as of March 5, 1984, are 4,506 SRO's and 3,231 RO's. This includes both power and non-power reactors. We estimate that approximately 60% of the licenses are for power reactors. Particularly for older dockets, the information in OLTS is difficult to verify. However, we consider these figures to be conservative estimates. There may be as many as 2,000 more operators and senior operators whose files have been purged. I hope this information is sufficient for your needs. For additional information to be generated, special programs will have to be developed or a hand count of the Regional dockets performed, delaying our work on upgrading the capability of the OLTS. This could ultimately cause delays in future requests.

2. How many Reactor Operator (RO) licenses have been issued?

Response

Same as Question 1.

3. How many SRO's have held a license for more than one year?

Response

Of the licensed SRO's 1,040 have held a license for more than one year, but have not had the license renewed. This number does not include SRO's and RO's whose licenses have been renewed (Question 5).

4. How many RO's have held a license for more than one year?

Response

Of the licensed RO's, 1,457 have held a license for more than one year, but have not had the licenses renewed.

5. How many SRO and RO licenses have been renewed at least once?

Response

Of the licensed SRO's and RO's, 1,703 SRO's and 823 RO's have had their licenses renewed at least once.

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