

NRC INSPECTION MANUAL

RNRP

INSPECTION PROCEDURE 69003

CLASS I RESEARCH AND TEST REACTOR OPERATOR LICENSES, REQUALIFICATION, AND MEDICAL EXAMINATIONS

PROGRAM APPLICABILITY: 2545

69003-01 INSPECTION OBJECTIVE

Determine if the operator requalification activities and training were conducted in accordance with regulatory requirements and the Office of Nuclear Reactor Regulation (NRR) approved program, since the last inspection.

69003-02 INSPECTION REQUIREMENTS

02.01 Active License Status. Determine if NRC licensed individuals have been engaged as operators or senior operators in accordance with 10 CFR 55.53(e).

02.02 Records Review. Determine if the licensee has conducted training, examined operators, and maintained records as required by the NRR-approved requalification training program.

02.03 Training on Changes. Determine if the licensee has implemented the training for changes made to the facility, to the facility procedures, and to the license including the Technical Specifications (TS) as required by the NRR-approved requalification training program.

02.04 Emergency Review and Simulations. Determine if the licensee has implemented training for abnormal and emergency procedures as required by the NRR-approved requalification training program.

02.05 Corrective Actions of Deficiencies. Determine if the licensee's requalification activities meet regulatory requirements of 10 CFR Part 55 and are commensurate with the NRR-approved requalification program for any individual disqualified because of inactivity as a licensed operator, unsatisfactory supervisor's evaluation, or failure of annual examination.

02.06 Operator Medical Examinations. Determine if the requirements for operator medical examination have been met in accordance with 10 CFR 55.21.

69003-03 INSPECTION GUIDANCE

General Guidance

10 CFR 50.54 (i-1) requires that reactor licensees have a requalification program for licensed senior reactor operators and reactor operators consistent with 10 CFR 55.59 (c). 10 CFR 55.59(c)(7) provides for accommodations to the requalification program for research and test reactors. The NRR approved operator requalification program may be found in the safety analysis report (SAR) or other licensee documents. The licensee's requalification training program provides the requirements for this inspection procedure. This program should apply to all licensed operators that are using their NRC license at the facility.

The inspector should determine if the licensee is conducting the licensed operator requalification program as approved by NRR. The inspector should also determine if the licensee is maintaining sufficient documentation to verify the technical adequacy of the examinations administered by the licensee.

The inspector should refer any questions about the conduct of the program to appropriate management, the NRR project manager, and, if appropriate, the Operator Licensing Branch or Human Factors Assessment Branch in NRR. Resolution of such questions should consider if the program should be reviewed further, or if licensed individuals should be reexamined.

General guidance may be found in the ANS Section 15 Standards as listed in Appendix B to Inspection Procedure 69001, "Class II Research and Test Reactors." Specific standards of interest for this inspection procedure are listed in the Reference section. Additional general guidance may be found in the Division 2 Regulatory Guides, and the "Other Regulatory Guides of Possible Interest to Division 2 Recipients" listed in the Division 2 Regulatory Guides Table of Contents. The reference to this guidance is to aid the inspector in technical evaluation of licensee programs and is not to be used as requirements unless the licensee has committed in writing to the NRC to use the specific guidance document.

The sample sizes and resource estimates suggested in the inspection procedure is provided for broad planning purposes and to define the typical depth of the inspection. It is not intended to be a rigid requirement on the inspector. Actual inspection at any facility may require more or less effort depending on past inspection history, conditions at the facility, and safety significance.

Specific Guidance

03.01 Active License Status. A sample of 25 percent of the operators should provide an acceptable sample for this inspection requirement. From licensee records, the inspector should select personnel at random. Licensed individuals should have actively performed

the functions of an operator or senior operator for a minimum of four hours each calendar quarter as required by 10 CFR 55.53(e). The inspector should review operating records and discuss them with the operators to verify that the selected individuals have been actively engaged in reactor operations, and the requalification program, e.g., required training, supervisor evaluations, and testing (this should be used in part to satisfy the requirements of the subsequent section on requalification training of this inspection procedure). License expiration dates should be checked to verify that operator licenses are current and/or have been renewed as required by 10 CFR 55.57. Also, notification of change in operator or senior operator status is required from the licensee for operators that no longer need or can qualify for a license per 10 CFR 50.74.

03.02 Records Review. The records review for the same operators as used in Section 03.01 above, should provide an acceptable sample for this inspection requirement. The licensee should maintain records in accordance with the requirements of the NRR-approved requalification program and associated administrative controls. The licensee's records should permit the inspector to verify the technical adequacy of examinations that have been administered by the facility licensee.

- a. Examinations. The licensee's examinations should be consistent with the testing requirements of the NRC-approved requalification training program. The inspector should verify the method of the examination, e.g., open or closed book, and timed and proctored or take home, was consistent with program requirements. The examinations should test operators on their knowledge of significant TS requirements, normal operating activities, and emergency conditions. Records should include questions and operator answers for the required examinations.
- b. Manipulations and Observations. All on-the-job training, including required reactor manipulations, should be completed and documented as specified by the approved operator requalification program. Training may also include verification of acceptable understanding of reactor events and resolutions by supervisor observations or discussions.
- c. Formal Training. The inspector should determine if the licensee's formal training program included the topics specified in 10 CFR 55.59 (c) (2) as required by the NRR-approved requalification training program and applicable to the facility.

As required by 10 CFR 55.53 (h), to maintain an active license, licensed operators and senior operators should participate in all required aspects of the requalification program, except where exempted by the plan. For example, circumstances of the operators work could reasonably exempt them from needing to attend selected training sessions or lectures. Specifically, a Senior Reactor Operator (SRO) who serves on the safety review committee and routinely reviews procedures and design changes may not need to attend a training session on this subject. If an individual is exempted from specific training, the inspector should verify that the individual has acceptable knowledge of the subject. This may be accomplished by discussions with the individual on several of

the related technical details. Where credit is taken for college level courses, this may be verified by class grade.

03.03 Training on Changes. The use of the same sample of operators for this inspection requirement should be acceptable. The inspector should be alert for areas in which, or individuals for whom, training does not appear to be in accordance with the requalification program or the licensee's administrative control requirements. Operators can take credit for collateral duties that ensure the changes are understood similar to that discussed above. Again the inspector should verify the knowledge through discussion with the individual on several of the changes. Changes that should be considered are procedure and design changes.

03.04 Emergency Review and Simulations. The use of the same sample of operators for this inspection requirement should be acceptable. This review and simulation may be included in supervisory observations or in participation in emergency preparedness drills and exercises in accordance with the approved requalification program. If covered in other inspection activities, it should not be repeated here.

03.05 Corrective Actions Of Deficiencies. The "actively involved" requirement is satisfied if the person is actively functioning in their normal position in addition to participating in the approved requalification program. If the individual has not actively participated in operator duties at the facility for a period of three months, as specified in 10 CFR 50.53 (e), the individual is not qualified to operate the facility until the individual operator has satisfied the requirements of 10 CFR 55.53 (f) or met other, applicable NRR-approved requalification requirements. This will ensure that an individual who has not functioned as an operator or a senior operator receives the required retraining and license activity experience (at least six hours for a test or research reactor) to resume the conduct of licensed activities in a safe and competent manner. If the individual received an unsatisfactory evaluation or examination result, the remedial action should be consistent with the requalification program requirements and the associated commitments by the licensee. The licensee may report the disqualification of an individual operator and specify corrective actions to be taken to the NRC. The inspector should verify that corrective actions were taken prior to resumption of licensed activities by the individual.

03.06 Operator Medical Examination. The verification of medical examinations for two licensed operators should provide an acceptable sample for this inspection requirement. The inspector should determine if the biennial operator medical examinations were conducted. Requirements related to this are in 10 CFR 55.21, 55.23, and 55.27 and in the requalification program. If an individual operator was found incapacitated for medical reasons, the facility licensee should report such in accordance with 10 CFR 55.25. Additional guidance may be found in Information Notice No. 91-08, "Medical Examinations for Licensed Operators," dated February 5, 1991.

69003-04 RESOURCE ESTIMATE

For planning purposes, the direct inspection effort to complete this inspection procedure is estimated to be three hours.

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