

October 30, 2008

MEMORANDUM TO: Frederick D. Brown, Director
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Nancy L. Salgado, Chief **/RA/**
Operator Licensing and Human Performance Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF OCTOBER 8, 2008, MEETING WITH INDUSTRY
FOCUS GROUP ON OPERATOR LICENSING ISSUES

On October 8, 2008, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting with the Industry Focus Group on operator licensing to discuss a number of operator licensing issues. Enclosure 1 lists the attendees at the meeting; no members of the general public were present.

This meeting was the latest in a series of meetings intended to promote efficient, effective, and consistent preparation and administration of initial operator licensing examinations. The discussions addressed issues related to simulator fidelity and testing, new reactor licensing, and other operator licensing issues. Enclosure 2 is the agenda for the meeting, and the discussion topics are summarized in Enclosure 3.

Representatives of the NRC and the industry agreed that this meeting was useful for the exchange of information and agreed to continue the periodic meetings.

Enclosures: As stated

CONTACT: Fred Guenther, NRR/DIRS
(301) 415-1056

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| DATE | 10/22/08 | 10/30/08 |

OFFICIAL RECORD COPY

List of Attendees - NRC / Industry Focus Group Meeting on Operator Licensing
October 8, 2008

| Name | Organization |
|-----------------------------------|---|
| Nancy Salgado (via telephone) | NRC / HQ |
| Lawrence Vick | NRC / HQ |
| George Usova | NRC / HQ |
| Richard Pelton | NRC / HQ |
| David Muller | NRC / HQ |
| John Munro | NRC / HQ |
| Siegfried Guenther | NRC / HQ |
| Sean Currie | NRC / HQ |
| Sam Hansell | NRC / RI |
| Malcolm Widmann | NRC / RII |
| Hironori Peterson (via telephone) | NRC / RIII |
| Ryan Lantz (via telephone) | NRC / RIV |
| Jack Roe | Nuclear Energy Institute (NEI) |
| Russell Smith | NEI |
| Chuck Sizemore | Florida Power and Light (FPL) – Point Beach |
| Gregg Ludlam | Exelon – Oyster Creek |
| John Steely | Duke Energy |
| Timothy Dennis | ANS 3.5 Standards Committee |
| Kerry Wright | FPL - Seabrook |
| Steve Dennis | Western Technical Services |
| Tom Mayfield | Entergy |
| Robert Meyer (via telephone) | Professional Reactor Operator Society |
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AGENDA FOR THE CATEGORY 2 PUBLIC MEETING WITH THE
INDUSTRY FOCUS GROUP (FG) ON OPERATOR LICENSING ISSUES

October 8, 2008; 9:00 a.m. - 2:00 p.m.
U. S. Nuclear Regulatory Commission
One White Flint North, Room 3B4
11555 Rockville Pike, Rockville, MD 20852-2738
Conference Bridge: 888-456-0285; Pass Code 22975

| <u>TOPIC</u> | <u>LEAD</u> |
|--|-------------|
| Introductions and Opening Remarks | NRC/FG |
| Public Input | Public |
| Generic Issues | NRC/FG |
| - Simulator fidelity and testing | |
| - NRC Form 396 OMB Clearance public comment closes 10/15 | |
| - Three new FAQs posted on the OL Feedback page | |
| - Storing medications on-site | |
| - New reactor licensing update | |
| - 2007 Training Report issued | |
| - Reporting medical conditions | |
| Public Questions and Answers | Public |
| Initial Licensing Issues | NRC/FG |
| - RIS-2008-16 Exam projections | |
| - Examination results (including Generic Fundamentals) | |
| - License eligibility (ACAD 00-003) | |
| - Other | |
| Public Questions and Answers | Public |
| Requalification Issues | NRC/FG |
| - IP-71111.11 changes | |
| - NRC staff questions | |
| Focus Group Issues | |
| - Promoting consistency between Regions | FG |
| Public Questions and Answers | Public |
| Summary / Conclusion / Action Item Review | NRC/FG |

DISCUSSION SUMMARY

GENERIC ISSUES

Simulator Scenario Based Testing (SBT) Methodology

The NRC staff acknowledged receiving the Nuclear Energy Institute's (NEI's) September 18, 2008, White Paper entitled "Nuclear Power Plant-Referenced Simulator Scenario Based Testing Methodology" for review and comment. Although the staff did share some preliminary observations regarding the paper, it informed the attendees that it will take some time to review the details and solicit input from its Regional examiners. The staff noted its general agreement with the "checklist" concept, but recommended that it might be better to limit the checklist to simulator performance items rather than mix them up with operating test validity criteria from NUREG-1021, "Operator Licensing Examination Standards for Power Reactors." The staff also reiterated its position that the proposed SBT Methodology does not relieve, relax, nor circumvent the functional, fidelity, and physical requirements of ANSI/ANS-3.5-1998, that was previously endorsed by the NRC. The staff's goal is to provide detailed technical comments, suggestions, and recommendations to NEI by November 30, 2008. Assuming that any technical issues are adequately resolved, the staff expects that it will be able to incorporate or endorse the SBT methodology with its pending revision of Regulatory Guide 1.149, "Nuclear Power Plant Simulation Facilities for Use in Operator Licensing Examinations," currently planned for 2009.

NRC Form 396 Office of Management and Budget (OMB) Clearance Pubic Comments

The NRC staff informed attendees that the triennial renewal of the OMB information collection clearance is in progress and that the public comment period will close on October 15, 2008. Anyone interested in reviewing the burden estimates and making comments should refer to the Documents for Comment page on the NRC's website.

Three New Frequently Asked Questions (FAQs) Posted on the OL Feedback Page

The NRC staff informed attendees that it recently posted three new questions and answers on the Operator Licensing Feedback page and briefly summarized the issues, which included the following: a clarification that the emergency plan topic on the administrative section of the initial licensing operating test does not include emergency operating procedures; guidance related to the rehiring and license retention (or relicensing) of retired operators; and guidance related to license conditions for operators suffering from sleep apnea.

Storing Medications On-site

The NRC staff informed attendees that it had recently received an inquiry regarding its policy with respect to operators keeping a supply of required medications on-site in case they are unable to return home for an extended period of time. The staff noted that it does not have an official policy but that it was planning to develop a new FAQ to alert facility licensees and operators to the issue.

New Reactor Licensing Update

A representative from the Office of New Reactors (NRO) provided a brief update of their significant operator licensing activities since the last meeting. Those activities included a visit to the Mitsubishi Heavy Industries digital control room simulator in Mars, PA, to assist the staff in planning its simulator training needs for license examiners and visits to Japan and Taiwan to gain insights into training and testing operators in digital control rooms. The staff also noted that the ANSI 3.1 working group is being reconstituted (see additional discussion below under license eligibility).

2007 Training Report Issued

The NRC staff informed attendees that it had recently issued its “Annual Report on the Effectiveness of Training in the Nuclear Industry for Calendar Year 2007” and that the report is available via a link from the NRC’s Operator Licensing Webpage. The staff provided a brief synopsis of the report, noting that the Human Factors Information System (HFIS) database for calendar year 2007 shows 255 fewer errors than in 2006 and that the human performance errors attributable to training constituted only a small fraction of the total. When the representative from the Professional Reactor Operator Society (PROS) noted that the data in HFIS appears to be dated, the staff acknowledged that its new contractor was working to catch up on the backlog since the previous contract expired. The staff also offered to make a presentation on HFIS during a future meeting to familiarize the FG with the system’s capabilities.

Reporting Medical Conditions

The NRC staff reported that some Regions have noted an increase in the incidence of medical conditions that are not properly reported to the NRC as required by the regulations. The staff noted that the last generic communication on this subject (Information Notice (IN) 2004-20) was not mailed directly to licensed operators but it did remind facility licensees that operators need to be familiar with their medical requirements so they can keep their employer informed of reportable changes in medical status. The NEI and PROS representatives suggested that the NRC explore other means of communicating directly with operators, but the FG noted that there are plenty of communications tools already available. The staff agreed to consider NEI’s suggestion and further noted that it has attended two contractor-sponsored medical workshops and would support the industry if it undertook a similar event.

INITIAL LICENSING ISSUES

RIS-2008-16 Exam Projections

The NRC staff reported that most facility licensees, including one new reactor licensee, had responded to the subject RIS with their examination projections for the next four years. The Region II representative indicated that its number of examinations and applicants per exam are increasing dramatically and that near term changes in exam dates and class sizes are impacting its ability to schedule its limited resources. The staff noted that the Mid-Atlantic Nuclear Training Group (MANTG) has taken an active role in helping Region I prioritize its examination schedule and suggested that the Southern States Nuclear Training Association (SSNTA) perform a similar service for Region II.

Examination Results

The NRC staff reported that it has been compiling the examination results for fiscal year 2008 and that the preliminary data shows no obvious adverse trends. The staff noted that it will update the graphs on the Operator Licensing Webpage when all the examination results are final (i.e., after any pending appeals are resolved). An NEI representative expressed concern that the RO written examination pass rate had declined significantly from 2003 through 2007, as evidenced by the graphs on the NRC's website, and suggested that the industry perform a root cause analysis of this adverse trend. The staff noted that the preliminary 2008 data appears to have reversed the trend and opined that the average written examination grades, which remained almost constant over that same period, are a better indicator of examination difficulty. [Note that, during the August 2007 meeting (see ML072630592 for a summary), the staff enumerated a number of factors, other than examination difficulty, that could be affecting operator performance: e.g., more difficulty in recruiting qualified applicants; trying to reduce cost by training more operators with fewer instructors; the retirement of experienced trainers; old-school training techniques may be less effective with the current generation of trainees; and less rigorous pre-exam screening criteria. The NRC staff found no basis to conclude that the examinations were getting more difficult, and the FG agreed with the staff's conclusion that a host of other factors are likely responsible for any changes in operator performance.]

The staff also briefly reviewed the results of the September 2008 generic fundamentals examination (GFE), noting that while the failure rate on the PWR examination was higher than normal, the average grades were consistent with past results, leading the staff to conclude that the examination was within the normal range of difficulty. The staff also reminded the FG attendees that they have the option of reviewing the GFE before it is administered, as described in Section c.4 of ES-205 of NUREG-1021.

License Eligibility (ACAD 00-003)

The NRC staff informed the attendees that it is aware of two potential changes that the Institute of Nuclear Power Operations (INPO), which was not represented at the meeting, is considering for ACAD 00-003. The first would clarify, at the staff's request, what type of activities would satisfy the requirement for 6 months of on-site experience for SRO applicants per Figure 2-3 of the ACAD, and the second would extend the academic-equivalence provisions of Figure 2-3 to Figure 2-4, as well. The staff also reviewed some recent eligibility waiver requests and encouraged facility licensees to resolve any eligibility questions before the applicants enter the training program rather than wait until the training is (almost) complete. The staff noted that reconstitution of the ANSI 3.1 working group, noted above, provides an opportunity to reconcile some of the differences between the industry standard and the ACAD. The chairman of the ANSI 3.1 working group, who happened to be representing NEI at the meeting, indicated that the Standard was definitely outdated; students are different today, and it needs to recognize INPO accreditation, state of the art simulators, and other technological advances and changes in our educational system. The staff agreed to continue working with INPO and the FG to address eligibility issues during future meetings.

REQUALIFICATION ISSUES

IP-71111.11 Changes

The NRC staff updated attendees on the status of a proposed revision to IP-71111.11, "Licensed Operator Requalification Program," that was first reported during the August 2007 FG meeting. The staff noted that it is working with a group of Regional examiners in an effort to resolve comments submitted with respect to the existing procedure. The staff does not intend to change the frequency of the inspections or the areas inspected, and no firm timeline has been established for its completion. The NEI and FG representatives expressed concerns that the staff not regulate through inspection or inspect against INPO ACAD guidelines, and the staff provided assurance that the new procedure would be reviewed to ensure compliance with the Backfit Rule.

NRC Staff Questions

The NRC staff sought feedback from the FG attendees regarding two questions that had recently come up with regard to requalification program management. Although the staff was aware that accredited programs often suspend their routine training cycles during plant outages, it sought clarification regarding the allowable frequency and duration of such breaks. The FG attendees explained that the breaks could last up to 90 days, but that plants are required to complete 5 to 6 training cycles per year (with each cycle lasting about 5 to 6 weeks) and a required minimum number of classroom and simulator training hours, and that INPO would issue a warning flag if a facility's breaks are too long or too frequent. The staff also sought clarification on the industry practice regarding make-up training if an operator missed part of a requalification training cycle, and the FG indicated that most facilities require their operators to make up any missed training by the end of the next training cycle.

FOCUS GROUP ISSUES

Promoting Consistency Between Regions

The FG members questioned the NRC staff regarding a draft guidance document that Region II had developed to help examiners screen SRO-only written examination questions and expressed concern that it was contributing to inconsistency between the Regions. The staff indicated that it was aware of the document and has been working with the other Regions to reach internal consensus on the guidance before presenting it to the FG for review and formal implementation. The staff noted that it currently plans to have each Region use the draft guidance for 6 months to a year and provide feedback to Region II to refine the guidance. The guidance is intended to clarify existing policy in NUREG-1021, so any question changes required as a result of the new screening tool will have to be justified using existing NUREG criteria. The staff committed to share the results of the trial examinations and the updated guidance with the FG during the next meeting. If the staff and FG determine that the new guidance adds value to the process, it will be formally implemented and incorporated in the next revision of NUREG-1021.