

April 11, 2011

Dr. Donald Wall, Director
Nuclear Radiation Center
Washington State University
PO Box 641300
Pullman, WA 99164-1300

SUBJECT: WASHINGTON STATE UNIVERSITY - REQUEST FOR ADDITIONAL
INFORMATION REGARDING THE WASHINGTON STATE UNIVERSITY
REQUALIFICATION PROGRAM

Dear Dr. Wall:

We have reviewed the Washington State University Nuclear Radiation Center Reactor Staff Requalification Program dated January 16, 2008, submitted by letter dated August 29, 2009. During our review, questions have arisen for which we require additional information and clarification. Please provide responses to the enclosed request for additional information within 30 days of the date of this letter in order for the U.S. Nuclear Regulatory Commission staff to complete the review.

In accordance with Title 10 of the *Code of Federal Regulations* Section 50.30(b), your response must be executed in a signed original under oath or affirmation. Also, your response must be submitted in accordance with 10 CFR 50.4, "Written Communications." Information included in your response that is considered security, sensitive, or proprietary, that you seek to have withheld from the public, must be marked in accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding."

If you have any questions regarding this review, please contact me at 301-415-4103 by electronic mail at: linh.tran@nrc.gov.

Sincerely,

/RA/

Linh N. Tran, Senior Project Manager
Research and Test Reactors Licensing Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Docket No. 50-27

Enclosure:
As Stated

cc: See next page

Washington State University

Docket No. 50-27

cc:

Dr. Kenneth Nash
Chair, Reactor Safeguards Committee
Nuclear Radiation Center
Washington State University
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Pullman, WA 99164 – 1300

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Reactor Supervisor, Nuclear Radiation Center
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Mr. David Clark
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Director
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Olympia, WA 98504-7827

Office of the Governor
Executive Policy Division
State Liaisons Officer
P.O. Box 43113
Olympia, WA 98504-3113

Test, Research, and Training
Reactor Newsletter
University of Florida
202 Nuclear Sciences Center
Gainesville, FL 32611

April 11, 2011

Dr. Donald Wall, Director
Nuclear Radiation Center
Washington State University
PO Box 641300
Pullman, WA 99164-1300

SUBJECT: WASHINGTON STATE UNIVERSITY - REQUEST FOR ADDITIONAL INFORMATION REGARDING THE WASHINGTON STATE UNIVERSITY RADIATION CENTER REACTOR STAFF REQUALIFICATION PROGRAM

Dear Dr. Wall:

We have reviewed the Washington State University Nuclear Radiation Center Reactor Staff Requalification Program dated January 16, 2008, submitted by letter dated August 29, 2009. During our review, questions have arisen for which we require additional information and clarification. Please provide responses to the enclosed request for additional information within 30 days of the date of this letter in order for the U.S. Nuclear Regulatory Commission staff to complete the review.

In accordance with Title 10 of the *Code of Federal Regulations* Section 50.30(b), your response must be executed in a signed original under oath or affirmation. Also, your response must be submitted in accordance with 10 CFR 50.4, "Written Communications." Information included in your response that is considered security, sensitive, or proprietary, that you seek to have withheld from the public, must be marked in accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding."

If you have any questions regarding this review, please contact me at 301-415-4103 by electronic mail at: linh.tran@nrc.gov.

Sincerely,

/RA/

Linh N. Tran, Senior Project Manager
Research and Test Reactors Licensing Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Docket No. 50-27

Enclosure:
As Stated
cc: See next page

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ACCESSION NO.:ML110940169 *concurrence via email NRR-088

Office	PRLB:PM	PRLB:LA	PRLB:BC	PRLB:PM
Name	LTran	GLappert	JQuichocho	LTran
Date	4/4/2011	4/5/2011	4/5/11	4/11/11

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OFFICE OF NUCLEAR REACTOR REGULATION
REQUEST FOR ADDITIONAL INFORMATION
WASHINGTON STATE UNIVERSITY TRIGA REACTOR
OPERATOR REQUALIFICATION PROGRAM
LICENSE NO. R-76
DOCKET NO. 50-27

We have reviewed the Washington State University Nuclear Radiation Center (WSUNRC) Reactor Staff Requalification Program dated January 16, 2008, submitted by letter dated August 29, 2009. Your requalification program was reviewed against Title 10 of the *Code of Federal Regulations*, Part 55 and the guidance provided in the American National Standards Institute/American Nuclear Society 15.4. During our review, questions have arisen for which we require additional information and clarification. Please provide responses to the following request for additional information (RAI):

RAI 1

10 CFR 55.59(b) states:

Additional training. If the requirements of paragraphs (a) (1) and (2) of this section are not met, the Commission may require the licensee to complete additional training and to submit evidence to the Commission of successful completion of this training before returning to licensed duties.

10 CFR 55.59(c)(4)(i) states:

Evaluation. The requalification program must include -- (i) Comprehensive requalification written examinations and annual operating tests which determine areas in which retraining is needed to upgrade licensed operator and senior operator knowledge.

ANSI/ANS 15.4, "Selection and Training of Personnel for Research Reactors," Section 5.5 states:

5.5 Examination administration and evaluation

The minimum acceptance score shall be 70% for each category of the written examination and 70% for the entire operating and oral examination. Individuals who did not achieve passing scores in one or more of the categories listed in Section 5.4 may be reexamined following retraining in the deficient areas. The responsible authority may waive reexamination in categories with passing scores provided the candidate has demonstrated proficiency in those portions of an examination.

ENCLOSURE

Section 2, Annual Operations Test, of the WSUNRC Reactor Staff Qualification Program, discusses the annual operating test and that individuals who fail must be given additional training. However, it does not address a pass/fail criteria nor does it address that personnel failing the operating test should successfully complete the addition training before returning to licensed duties. Please provide a pass/fail criteria for facility administered annual operating tests as part of the WSUNRC Reactor Staff Qualification Program.

RAI 2

10 CFR 55.53(h) states:

[Each license contains and is subject to the following conditions whether stated in the license or not:] ... The licensee shall complete a requalification program as described by § 55.59.

10 CFR 55.59(a), Paragraphs (1) and (2) state:

(a) *Requalification requirements.* Each licensee shall --(1) Successfully complete a requalification program developed by the facility licensee that has been approved by the Commission. This program shall be conducted for a continuous period not to exceed 24 months in duration. (2) Pass a comprehensive requalification written examination and an annual operating test.

The 1st paragraph of the WSUNRC Reactor Staff Qualification Program states:

Each licensed operator and Senior Operator at the Washington State University Nuclear Radiation Center reactor facility will participate in the reactor staff requalification program as outlined below, with the exception that the senior reactor operator who is in charge of the program will be exempted from taking the written examination.

This paragraph as written may exempt one person indefinitely from the requirements of taking a biennial written examination. The NRC recognizes that licensees may have limited qualified staff. On a case by case basis, the NRC may approve requalification programs with the statement described in the first paragraph of the WSUNRC Reactor Staff Qualification Program that additionally describes rotating the "senior reactor operator who is in charge of the program" among all senior operators for each operating cycle. This ensures that no one individual is permanently exempted from meeting the regulations of 10 CFR Part 55. Please modify the scope to ensure that one individual is permanently exempted from meeting the requirements of 10 CFR Part 55.