

June 30, 2014

MEMORANDUM TO: Scott Morris, Director
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: David Muller, Acting Chief */RA/*
Operator Licensing and Training Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MAY 6, 2014, MEETING WITH INDUSTRY
FOCUS GROUP ON OPERATOR LICENSING ISSUES

On May 6, 2014, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting with the Nuclear Energy Institute's Operating Licensing Focus Group to discuss with the nuclear industry a number of operator licensing issues.

This meeting was the latest in a series of meetings intended to promote efficiency, effectiveness, and open communications with regard to initial operator licensing and licensed operator requalification. The discussions addressed a variety of issues, including the current grading criteria on the simulator scenario portion of NRC operator licensing examinations; lessons learned regarding NRC Inspection Procedure 71111.11, "Licensed Operator Requalification and Licensed Operator Performance," and NRC inspections of facility licensed operator requalification programs; and revisions to the eligibility guidelines for individuals applying for an NRC reactor operator license. 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:

1. List of Attendees
2. Agenda
3. Discussion Topics

CONTACT: Sean Currie, NRR/DIRS/IOLB
(301) 415-3967

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DATE	6/30/2014	6/30/2014

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List of Attendees – Nuclear Regulatory Commission (NRC) / Nuclear Energy Institute Operator Licensing Focus Group (NEI OLFG) May 6, 2014	
Name	Organization
John (Jack) McHale	NRC
Tim Kolb	NRC
David Muller	NRC
John Munro	NRC
Sean Currie	NRC
Don Jackson	NRC (via telephone)
Pete Peterson	NRC (via telephone)
Gregg Ludlam	NEI OLFG
Chuck Sizemore	NEI OLFG
John Steely	NEI OLFG
Nick Pappas	NEI OLFG
Tom Giebelhausen	NEI OLFG
Michael Petersen	NEI OLFG
Russell Joplin	NEI OLFG
Bob Meyer	Public - Professional Reactor Operator Society (via telephone)

AGENDA FOR THE CATEGORY 2 PUBLIC MEETING WITH THE NEI OPERATOR
LICENSING FOCUS GROUP REGARDING TRAINING, EXAMINATION, AND INSPECTION
PROCESSES

Tuesday, May 6, 2014
8:00 a.m. to 12:00 p.m. Eastern Standard Time

Nuclear Energy Institute
1776 I St. N.W., Suite 400
Washington, DC 20006

<u>TOPIC</u>	<u>LEAD</u>
Introductions and Opening Remarks	NRC/NEI panel
Public Inputs	Public
Simulator Evaluation grading	NEI
IP 71111.11 (Licensed Operator Requalification Program Inspection Procedure) changes	NEI
Review of IRT Recommendations and Current Status	NEI
ACAD 10-001 eligibility review: RO flowchart revision	NEI
NEI/NRC National Operating Licensing Workshop takeaways	NEI
Additional Items of Interest	NRC
Public Comments	Public
Summary/Conclusions/Action Items	NRC/NEI

DISCUSSION SUMMARY

Simulator Evaluation Grading

The NRC staff discussed with the Operator Licensing Focus Group (OLFG) their concerns regarding the current simulator scenario grading criteria for individuals taking NRC initial operator licensing examinations (as contained in NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Section ES-303 D.2.b). In particular, the staff discussed that the current simulator scenario grading criteria does contain some ambiguity, which can allow for significant subjectivity when grading individuals on this portion of their NRC examination. The OLFG acknowledged the staffs' concerns, but at this time, the OLFG had no specific recommendations for improvement. The staff further informed the OLFG that the NRC will be forming a team to recommend improvements to the simulator scenario grading criteria, as well as other possible enhancements to NRC operating tests. The OLFG offered to provide assistance to the staff in this area.

During this portion of the discussion, the staff also presented to the OLFG two other items related to NUREG-1021:

- Revision 10 of NUREG-1021, which largely adds guidance for the licensing and examination process for operators at new reactors, is likely to be issued in August 2014. This revision will include policies and practices for videotaping crews of applicants taking simulator examinations (for both new and existing reactors), and these policies were discussed with the OLFG.
- With respect to grading individuals during simulator scenarios, revision 10 does provide some clarifications, but any significant changes to scenario grading will occur only after revision 10 has been issued, likely as a supplement to revision 10.

Changes to IP 71111.11, Licensed Operator Requalification Program Inspections

The staff presented to the OLFG that a revision was being drafted to NRC Inspection Procedure (IP) 71111.11, "Licensed Operator Requalification Program and Licensed Operator Performance." Changes contained in this revision will include:

- A revised method for assessing requalification simulator scenario quality. The current method appears to overemphasize the importance of a single flawed scenario event, which will be corrected in the revision.
- Due to being subjective and with no guidance provided in the IP, the NRC's rating of the overall level of difficulty of simulator scenarios will be eliminated.
- Eliminating the requalification retake exam 10 percent failure rate metric. This metric does not appear to be effective in evaluating the quality of remedial training.
- Adding flexibility for NRC inspectors in conducting control room observations. Instead of requiring 4 hours of observations per calendar quarter, 16 hours per calendar year may be used instead.

The OLFG acknowledged these proposed changes, and that these changes would address some of their concerns they have with the current revision of the IP. The OLFG also stated that they would check with the nuclear industry for any additional comments on IP 71111.11, and provide them to the NRC.

Review of IRT Recommendations and Current Status

In April of 2011, the OLFG issued an Independent Review Team (IRT) report, which contained 7 overall recommendations for the initial operator licensing examination process. The OLFG provided to the staff an update on these 7 recommendations, and concluded that the recommendations were, for the most part, complete. One recommendation that was still in progress was the project to revise the Knowledge/Abilities (K/A) catalogs, i.e., NUREGs-1122 and 1123, which provide a content basis for NRC licensing examinations for existing reactors. The OLFG stated that they expect to deliver revised K/A catalogs for NRC review in the September 2014 time frame.

ACAD 10-001 Reactor Operability Eligibility Flowchart

Proposed changes to ACAD 10-001, “Guidelines for Initial Training and Qualification of Licensed Operators,” which contains industry standards for meeting the eligibility requirements for licensing new personnel, were presented by the OLFG and discussed with the staff. In particular, changes in crediting experience as a non-licensed operator and for crediting experience gained at non-comparable facilities were discussed as they pertained to meeting the eligibility requirements for individuals seeking an NRC reactor operator license. In general, the staff agreed with the proposed changes to ACAD 10-001.

Additionally, the staff and the OLFG discussed issues and possible requirements for senior reactor operator (SRO) instructors to become licensed as SROs by the NRC.

National Workshop Takeaways

On January 7-8, 2014, a National Examiner’s Workshop was held, attended by members of the NRC staff, the OLFG, and the nuclear industry. Based upon this workshop, the staff and the OLFG discussed some of the items of continued interest, including issues related to IP 71111.11 (see previous item above), and what elements should be included in a proper alternate path job performance measure (i.e., elements to include in an individual test-item task that executes an alternate (non-normal) path).

Additional NRC Items of Interest

The NRC informed the OLFG that additional guidance, consistent with the current revision of NUREG-1021, had been provided to NRC Regional Examiners regarding the grading of individuals taking NRC simulator scenario examinations, and for processing examination waiver requests, to add consistency in these areas.

The staff presented an update on NRC activities associated with Fukushima Near-Term Task Force (NTTF) recommendation 8, which primarily concerns beyond design basis accident procedures and operator actions.

In particular, the staff informed the OLFG that rule making associated with recommendation 8 will likely be combined with rule making associated with NTTF recommendations 4, 9, and 10. Additionally, 3 K/A areas associated with beyond design basis accidents are planned to be added to the K/A catalogs, such that in the future, these areas will be subject to testing on NRC operator licensing examinations. The staff further stated, in agreement with the OLFG, that care must be exercised in implementing NTTF recommendations, such that the current state of operator licensing training and examination is not negatively impacted.

The NRC staff noted that draft regulatory guide DG-1310, which endorses the latest and heavily revised version of ANSI-3.4 for licensed operator medical standards, was released for public comment on April 25, 2014. The draft regulatory guide fully endorsed the revised ANSI standard without exception. The NRC asked that the OLFG publicize and endorse adopting the new standard, once the final regulatory guide is issued.