REGULATORY ANALYSIS

DRAFT REGULATORY GUIDE DG-1329
"Qualification and Training of Personnel for Nuclear Power Plants"
Proposed Revision 4 of Regulatory Guide 1.8, dated May, 2000

1. Statement of the Problem

Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," Revision 3, was issued in 2003 to identify that the contemporary version of consensus standard American National Standards Institute/American Nuclear Society (ANSI/ANS)-3.1-1993, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants," is a method acceptable to the staff for complying with those portions of the Nuclear Regulatory Commission's (NRC) regulations associated with approval or acceptance of selection, qualification, and training of personnel at nuclear power plants. Standard ANSI/ANS-3.1-1993 was revised in 2014 and provides improved guidance.

ANSI/ANS-3.1-2014 provides criteria for the selection, qualification, and training of personnel for the operating organization of stationary nuclear power plants. This standard specifies minimum qualifications for levels of management and individuals. Updates in the standard include:

- alignment on industry selection, training and qualification criteria between the American Nuclear Society, the U.S. Nuclear Regulatory Commission, and the Institute of Nuclear Power Operations;
- providing a common language across the industry;
- incorporation of 20 years of learning and experience with nuclear power plant training program implementation and performance;
- better addresses supplemental personnel training and qualification; and
- updates of position descriptions in light of new nuclear power plant construction, current position terminology, and evolving technology.

2. Objective

Revise RG 1.8 to identify to licensees that ANSI/ANS 3.1-2014 is acceptable for their use to meet the requirements for selection, qualification, and training of nuclear power plant personnel under 10 CFR Parts 50, 52 and 55. Revising this regulatory guide is consistent with the NRC policy of evaluating the latest versions of national consensus standards to determine their suitability for endorsement by regulatory guides. This is in accordance with Public Law 104 113, "National Technology Transfer and Advancement Act of 1995." This approach also will comply with the NRC's Management Directive (MD) 6.5, "NRC Participation in the Development and Use of Consensus Standards" (ML16193A497).

3. Alternative Approaches

The NRC staff considered the following alternative approaches:

1. Do not revise Regulatory Guide 1.8

2. Withdraw Regulatory Guide 1.8

3. Revise and update Regulatory Guide 1.8 to address the current ANSI/ANS standard.

Alternative 1: Do Not Revise Regulatory Guide 1.8

Under this alternative, the NRC would not revise RG 1.8 and the current guidance would be retained. If NRC takes no action, there would not be any changes in costs or benefit to the public, licensees, or the NRC. However, the "no action" alternative would not comply with the National Technology Transfer and Advancement Act of 1995 that requires Federal agencies to use standards developed or adopted by voluntary consensus standards or address use of multiple standards on the same topical area. The "no action" alternative would also discourage licensee's voluntary use of the most current guidance because the NRC did not affirm the acceptance of the standard. Thus, they may not use the new standard, and gain the value of using the enhanced guidance.

Alternative 2: Withdraw Regulatory Guide 1.8

Under this alternative the NRC would withdraw this regulatory guide. This would eliminate the problems identified above regarding the regulatory guide. It would also eliminate the only readily available description of the methods the NRC staff considers acceptable for demonstrating compliance with 10 CFR 50, 10 CFR 52, and 10 CFR 55. Although this alternative would be less costly than the proposed alternative, it would impede the public's accessibility to the most current regulatory guidance.

Alternative 3: Revise Regulatory Guide 1.8

Under this alternative, the NRC would revise RG 1.8, taking into consideration the knowledge and experience gained since last endorsing ANSI/ANS-3.1, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants." By doing so, the NRC would ensure that the RG guidance available in this area is current and accurately reflects the staff's position.

The impact to the NRC would be the costs associated with preparing and issuing the revised regulatory guide. The impact to the public would be the voluntary costs associated with reviewing and providing comments to the NRC during the public comment period. The impact to facility licensees would be the cost of implementing the new standard. The value to the NRC staff and facility licensees would be the benefits associated with enhanced efficiency and effectiveness in using a common guidance document as the technical basis for license applications and other interactions between the NRC and its regulated entities.

Conclusion

Based on this regulatory analysis, the NRC staff concludes that revision of RG 1.8 is warranted. This action will enhance the licensing process and to provide guidance for

compliance with the applicable regulations in 10 CFR Parts 50, Part 52, and Part 55. The proposed regulatory action will increase safety, reduce any unnecessary burden and, provide a more uniform process for addressing a licensee's ability to select, train, and qualify personnel for nuclear power plants.