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Honorable Nunzio J. Palladino  
Chairman  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Dr. Palladino:

SUBJECT: ACRS COMMENTS ON RULEMAKING FOR REVISIONS TO OPERATOR  
LICENSING REQUIREMENTS

During its 308th meeting, December 5-7, 1985, and in previous meetings of its Subcommittee on Human Factors, the Advisory Committee on Reactor Safeguards considered a package of rule changes and Regulatory Guide revisions related to operator licensing which is being proposed for final approval. The package consists of:

- . Revision to 10 CFR Part 55, "Operators' Licenses"
- . Revision to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities"
- . Revision to Regulatory Guide 1.134, "Medical Evaluation of Licensed Personnel for Nuclear Power Plants"
- . Revision to Regulatory Guide 1.149, "Nuclear Power Plant Simulation Facilities for Use in Operator License Examinations"
- . Revision to Regulatory Guide 1.8, "Qualifications and Training of Personnel for Nuclear Power Plants"

As we understand these rule changes and revisions to Regulatory Guides, they are incorporating few changes from current standards and practices but rather are assembling in more coherent form a number of changes in operator licensing which have evolved since the post-TMI period. With the exception of several comments below, we endorse the rulemaking package and recommend that it be approved.

Section 50.54.i-1 of 10 CFR Part 50 requires licensees to have in effect an operator requalification program within three months after issuance of an operating license. However, the Commission's regulations do not specifically require operator training programs. We believe that this is an unintentional deficiency of the regulations. Although there are no major consequences because all licensees have programs in effect, we bring this to your attention at this time with the recommendation that the Commission might wish to utilize this occasion to correct this deficiency.

We believe the proposed rule changes are compatible with and appropriately take advantage of industry initiatives, such as the INPO training accreditation program.

These comments and recommendations should be considered in conjunction

with our letter of December 12, 1985 on Requalification Programs for Licensed Power Reactor Operators.

Sincerely,

David A. Ward  
Chairman

Reference:

Draft SECY paper, with enclosures, from W. J. Dircks, Executive Director, for Operations, to the Commissioners, on "Final Rulemaking for Revisions to Operator Licensing -- 10 CFR 55 and Conforming Amendment" provided to the ACRS by the NRC Staff on or about November 20, 1985

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