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## PUBLIC SUBMISSION

**Docket:** NRC-2018-0023

Qualification and Training of Personnel for Nuclear Power Plants; Draft Regulatory Guide

**Comment On:** NRC-2018-0023-0001

Qualification and Training of Personnel for Nuclear Power Plants

**Document:** NRC-2018-0023-DRAFT-0006

Comment on FR Doc # 2018-02816

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### Submitter Information

**Name:** Lana Dargan

**Submitter's Representative:** Ellen

**Organization:** Anderson

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### General Comment

See attached file(s)

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### Attachments

04-13-18\_NRC\_Industry Comments to Draft Regulatory Guide DG-1329 Qualification and Training of Personnel for Nuclear Power Plants + Attachment

**ELLEN P. ANDERSON**

*Director, Radiation and  
International Liaison.*

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NUCLEAR ENERGY INSTITUTE

April 13, 2018

Ms. May Ma  
Office of Administration  
Mail Stop: OWFN-2A13  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Industry Comments to Draft Regulatory Guide DG-1329, "Qualification and Training of Personnel for Nuclear Power Plants" (Federal Register Vol. 83, 6053, dated February 12, 2018 - Docket ID NRC-2018-0023)

**Project Number: 689**

Dear Ms. Ma:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)<sup>1</sup> appreciates the opportunity to provide comments on the proposed revision 4 to Regulatory Guide 1.8 (DG-1329) which describes the methods that the NRC staff considers acceptable for complying with those portions of the Commission's regulations associated with the selection, qualifications and training of nuclear power plant personnel.

We appreciate the staff providing additional clarification on experience requirements for those RPMs who have previous onsite time and nuclear power plant radiation protection experience. However, for practical reasons, we request that the staff extend the time to temporarily fill the RPM position from three to six months.

We also appreciate the staff's February 2017 endorsement of ACAD 10-001 Rev. 1 "Guidelines for Initial Training and Qualification of Licensed Operators" in NUREG-1021, Rev. 11 "Operator Licensing Examination Standards for Power Reactors". However, we believe that the proposed 3-year nuclear power plant experience requirement for all non-licensed personnel is in direct conflict with this NRC-endorsed ACAD document.

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<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on behalf of its members on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

Ms. May Ma  
April 13, 2018  
Page 2

We refer you to the attachment for detailed comments pertaining to this draft regulatory guide.

We appreciate your consideration of the industry's perspectives and would welcome the opportunity for further interactions with the NRC staff on this matter.

Please contact me or Mr. Tim Riti at [txr@nei.org](mailto:txr@nei.org) if you require information or clarification concerning these comments.

Sincerely,

A handwritten signature in cursive script that reads "Ellen P. Anderson".

Ellen P. Anderson

ATTACHMENT

NEI COMMENTS ON DRAFT REGULATORY GUIDE DG-1329 (*Proposed Revision 4 to RG 1.8*)

Affected Section	Comment/Basis	Recommendation
Sect. 1.1, Page 7	<p>1. It appears that the guidance discussed in Section 4.3.3 for the Radiation Protection Manager contradicts this section.</p> <p>2. Both ANSI 3.1 (1993) and (2014) allow for an individual to fill a specific position even if that person does not meet the requirements for that position if the individual is provided a staff of individual(s) whose qualifications meet the selected middle manager qualification:</p> <p><i>"An individual may be accepted for a specific position even if the person does not meet the requirements for that position if the individual is provided a staff of individual(s) whose qualifications meet the selected middle manager qualification."</i></p>	<p>1. Please clarify or refer the reader to section 4.3.3 for Radiation Protection Manager qualifications.</p> <p>2. We note that this has been a long-standing NRC position since 1993. Why has NRC changed their position on this issue? Have there been industry performance deficiencies resulting in this change of NRC position?</p>
Sect. 1.3, Page 7	<p>The last sentence reads: "Personnel who do not meet the requirements for this position should not be assigned to temporarily fill the position for periods exceeding three months."</p> <p>For plants with a robust succession planning process, filling a vacated Radiation Protection Manager position within three months could be achieved. However, while three months may appear to be sufficient time to find,</p>	<p>Please increase the timeframe for personnel who do not meet the requirements for the RPM position to temporarily fill the position for periods to not exceed exceeding six months rather than 3 months.</p>

ATTACHMENT

Affected Section	Comment/Basis	Recommendation
	<p>acquire, assess, and hire an experienced external candidate to fill a Radiation Protection Manager position from outside an organization, six months, rather than three is a more realistic timeframe to fill a vacated Radiation Protection Manager position.</p>	
<p>Sect. 1.4, Page 8, first sentence</p>	<p>The proposed 3 year responsible nuclear power plant experience requirement for all non-licensed personnel would be in direct conflict with ACAD 10-001 Rev. 1 "Guidelines for Initial Training and Qualification of Licensed Operators" which was previously endorsed in NUREG-1021, Rev. 11 "Operator Licensing Examination Standards for Power Reactors" published February, 2017 and discussed at an NRC public meeting held on March 23, 2017 (ref. ML17102B020). ACAD 10-001, Rev. 1 contains Figure 2-2, "Senior Reactor Operator Eligibility – RO Upgrade or Direct SRO Licensed at Another Facility or Direct SRO Military RO Equivalent," and Figure 2-3, "Senior Reactor Operator Eligibility - Direct SRO for Degreed Personnel," outlining experience requirements.</p>	<p>Align the responsible nuclear power plant experience to the following contained in ACAD 10-001, Rev. 1.</p> <ul style="list-style-type: none"> <li>• A military candidate that does not have a degree but has 2 years or more in a position equivalent to a reactor operator at a military reactor. (Fig. 2.2)</li> <li>• A non-licensed candidate but with a degree and 18 months at a comparable facility. (fig. 2-3)</li> <li>• A non-licensed candidate but with a degree and 27 months at a noncomparable facility. (Fig. 2-3)</li> </ul>
<p>Sect. 1.4, Page 8, 4<sup>th</sup> sentence</p>	<p>The proposed requirement for a Senior Operator applicant that does not have a bachelor's degree in engineering or equivalent to have held an operator's license removes</p>	<p>Align the responsible nuclear power plant experience to the following contained in ACAD 10-001, Rev. 1.</p> <ul style="list-style-type: none"> <li>• A non-licensed candidate but with a nontraditional degree and 36 months.</li> </ul>

ATTACHMENT

Affected Section	Comment/Basis	Recommendation
	the flexibility of the nontraditional degree option contained in ACAD 10-001, Rev.1.	(Fig. 2-3)
Sect. 1.4, Page 8.	Some of the exceptions noted above in this draft RG related to Senior Operators appear to be in direct conflict to the NRC agreement with ACAD 10-001, Rev. 1.	Consider the following as an exception: An applicant for a Senior Reactor Operator (SRO) license should meet the minimum qualifications, education, experience and training as specified in the facility licensee's "systematic approach to training" program.