

6/27/80

MINUTES OF THE
ACRS SUBCOMMITTEE MEETING ON
REGULATORY ACTIVITIES
JUNE 4, 1980
WASHINGTON, DC

The ACRS Subcommittee on Regulatory Activities held a meeting on June 4, 1980, at 1717 H Street, N.W., Washington, D.C. Mr. Sam Duraiswamy was the Designated Federal Employee for the meeting.

INTRODUCTORY STATEMENT BY THE CHAIRMAN

Dr. Siess, the Subcommittee Chairman, convened the meeting at 8:45 a.m. and indicated that the purpose of the meeting is to review the following items:

1. Proposed Revisions to 10 CFR Part 55, "Operators' Licenses" and 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities".
2. Proposed Regulatory Guide 1.23, Revision 1, "Meteorological Programs in Support of Nuclear Power Plants".

He stated that in addition to the above items, the Subcommittee would also discuss the following:

3. Response from Mr. Dircks, Acting Executive Director for Operations to the May 6, 1980 ACRS letter concerning the NRC Staff's procedure in assigning specific identification numbers to proposed Regulatory Guides.
4. Future schedule; the need and the possibility of having a special Regulatory Activities Subcommittee meeting to review Regulatory Guide 1.97, Revision 2.

He indicated that the Subcommittee had received neither written comments nor requests for time to make oral statements from members of the public.

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PROPOSED REVISIONS TO 10 CFR PART 55, "OPERATORS' LICENSES", AND 10 CFR PART 50, "DOMESTIC LICENSING OF PRODUCTION AND UTILIZATION FACILITIES"

Mr. Wiebe stated that the proposed revisions to 10 CFR Parts 50 and 55 are intended to update requirements for issuance of licenses to operators of licensed nuclear facilities and also to incorporate lessons learned from the TMI-2 accident and other operating experiences. These revisions delineate:

1. requirements relating to educational, experience and training for licensed operators,
2. procedures for licensing and requalification, and
3. requirements that simulators be used in both initial and requalification training programs.

These proposed revisions incorporate, as appropriate, the recommendations delineated in SECY-79-330E, dated July 30, 1979 and SECY-79-330F, dated September 11, 1979.

With regard to the educational requirement that requires that an applicant for senior operator license should have a minimum of 60 semester hours of college level education in technical subjects, Mr. Mathis commented that it may be difficult to find personnel who can meet this requirement.

Mr. Milhoan stated that the NRC Staff has also recognized that it may not be possible to implement this requirement on a short-term basis; they intend to implement this on a long-term basis.

Dr. Siess commented that a BS program in nuclear engineering may not provide 60 semester hours of academic training in the specified technical subjects. The term "college level education" used in 10 CFR Part 55 does not provide specific guidance; this term is too general in that it could be interpreted in different ways. He suggested that additional clarification of the term "college level education" would be helpful.

Mr. Milhoan stated that Regulatory Guide 1.8, which is being revised, would provide specific and detailed information on the educational qualifications.

In response to a question from Mr. Mathis as to whether the NRC Staff has conducted a survey to see how many of the senior operators now working in nuclear power plants will satisfy the qualification requirement proposed in 10 CFR Part 55, Mr. Milhoan stated that he will provide that information at a later date while discussing Regulatory Guide 1.8.

Mr. Mathis suggested that the NRC Staff try to put together a career development program for operators and include that in the operators' licensing system. He believes such system would help produce well trained operators.

Mr. Milhoan stated that he believes the information provided in 10 CFR Part 55 and Regulatory Guide 1.8 would lead to such a career development program for operators.

In response to a question from Mr. Mathis as to whether the NRC Staff has obtained comments from the Institute of Nuclear Power Organization (INPO) on the proposed revisions to 10 CFR Parts 50 and 55, Mr. Milhoan stated that they have not yet discussed these revisions with INPO.

Dr. Siess stated that the NRC Staff should make an effort to set up a meeting with INPO as soon as possible to discuss the proposed revisions to 10 CFR Parts 50 and 55 and get their comments.

Dr. Siess commented that the relationship between the proposed Regulatory Guide, "Nuclear Power Plant Simulators for Use in Operator Training" and 10 CFR Part 55 is not made clear; he suggested that additional clarification on this issue would be helpful.

The NRC Staff indicated that they will provide additional clarification.

The Subcommittee suggested several other editorial changes, provided suggestions for clarification in several areas and indicated that the NRC Staff could issue the Proposed Revisions to 10 CFR Parts 50 and 55 for public comment.

PROPOSED REGULATORY GUIDE 1.23, REVISION 1, "METEOROLOGICAL PROGRAMS
IN SUPPORT OF NUCLEAR POWER PLANTS"

Miss Brown stated that Regulatory Guide 1.23, Revision 1 was issued as Safety Guide 23 in February 1972. The proposed revision to this Guide reflects the current state of the art in meteorological technology and also accommodates some of the lessons learned from the TMI-2 accident concerning meteorological measurement programs at Nuclear Power Plant sites.

Dr. Siess stated that the following statements in the Regulatory Position Section of this Guide need certain modifications and/or additional clarification:

- (1) Page 5 - "This section describes... to assess siting, licensing and environmental factors prior to plant operation". He suggested that proper distinction between the words "siting", "licensing" "safety" and "environmental" would be helpful.
- (2) Page 10 - With regard to the statement which states "Similarity between the system accuracies should be demonstrated", he stated that the NRC Staff's intent is not made clear in this statement and suggested that certain modifications would be helpful.
- (3) Page 10 - The NRC Staff's intent is not explicitly defined in the statement which states "This display should be easily visible to operators

in the control room and should be labeled so that the information is clearly understood".

The NRC Staff indicated that they would make appropriate changes to resolve these above comments.

The Subcommittee discussed the comments from Dr. Frank Gifford, ACRS consultant, and from Dr. John Spengler (Assistant Professor, Harvard School of Public Health) obtained by and transmitted through Dr. Moeller. The Subcommittee stated that these comments should be responded to by the NRC Staff along with and in the same manner as the comments received from the public.

Mr. Abbey from the Office of Research of the NRC stated that he has several significant concerns in some areas of this Guide.

The Subcommittee stated that Mr. Abbey can provide his comments to the Office of Standards Development for consideration, with copies to the ACRS.

The Subcommittee suggested several other editorial changes, provided suggestions for clarification and improvement in certain areas of this Guide and indicated that the NRC Staff could issue this Guide for public comment.

DISCUSSION OF THE NRC STAFF'S PROCEDURE IN ASSIGNING SPECIFIC IDENTIFICATION NUMBERS TO PROPOSED REGULATORY GUIDES

In its May 6, 1980 letter, the ACRS expressed concern about the NRC Staff's practice for assigning identification numbers to proposed Regulatory Guides and recommended strongly that the NRC Staff should assign specific identification numbers to proposed Regulatory Guides prior to submitting them for ACRS review.

In a letter dated May 22, 1980, Mr. Dircks, Acting Executive Director for Operations, stated that the NRC Staff intends to include Task Numbers in

Dr. parentheses on all (proposed and active) Regulatory Guides to resolve the
not concern expressed by the ACRS in its letter of May 6, 1980. He stated
Re also that the 1.XXX designation presently used by some of the NRC Staff
ma will be discontinued.

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no The Subcommittee did not raise any objection to this procedure and indicated
Au that it will inform the full Committee about this matter.

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FUTURE MEETING

D The Regulatory Activities Subcommittee meeting scheduled to be held on
July 9, 1980 has been cancelled.

Another Regulatory Activities meeting is scheduled to be held on August 6,
1980 to discuss the following items:

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Post-Comment Items

1. Regulatory Guide 1.97, Revision 2, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident".
2. Regulatory Guide 1.136, Revision 2, "Material for Concrete Containments".
3. Regulatory Guide (Task No. SC 704-5), "Functional Specification for Safety-Related Valve Assemblies in Nuclear Power Plants".

Pre-Comment Items

4. Proposed Regulatory Guide 1.8, Revision 2, "Personnel Selection and Training".
5. Proposed Amendment to 10 CFR 50, Appendix A to Reference 10 CFR 50, Appendix B.
6. Proposed Regulatory Guide (Task No. RS 801-4), "Periodic Testing of Torque-protected Motor Operated Valves Important to Safety".
7. Proposed Revision to 10 CFR Part 50.54, "Control Room Staffing and Working Hour Limitation"
8. Proposed Regulatory Guide 1.33, Revision 3, "Quality Assurance Program Requirements (Operation)"