



OFFICE OF THE COMMISSIONER

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555

October 3, 1990

Taylor
Lynch
Thompson
Blaker
Hickley
Ehret
ED: RIF

TM
WR
JRA
Gus L

Were they coordinated w/out?

Wp

Kenneth R. Holmes
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Dear Ken:

When I was at the Vogtle site on August 21, 1990, you and various members of your staff expressed concerns about the NRC's operator requalification examination process and, specifically, the frequency with which NRC's operator licensing examiner standards contained in NUREG-1021 were being revised, including "pen and ink" changes to the standards made by NRC examiners. You indicated that frequent revisions to the standards were extremely frustrating to your organization, because incorporation of the revised standards into the requalification training program and the preparation of examinations requires considerable lead time and effort. You specifically noted that at a recent NRC/industry workshop in the spring of 1990, which was held to discuss Revision 6 of the examiner standards, the staff indicated that Revision 7 to the standards was "waiting in the wings". This announcement, I understand, added to your concern.

Since my return from Vogtle, I have checked further on the concerns that you raised to determine what, if anything, needs to be done to ensure that licensees are given ample time to comment on, and implement, revisions to the examiner standards. I share the following with you:

As with any new endeavor of this magnitude, early on in the implementation of the revised requalification process the NRC learned a number of lessons about how to go about most effectively implementing this process. Accordingly, substantial changes were made to the examiner standards, incorporating these various lessons. In each case, the revisions were preceded by an opportunity for the industry to comment. Between revisions 5 and 6 of the examiner standards, however, the NRC headquarters operator licensing organization issued two errata sheets to the NRC regional offices and to all licensees. The errata sheets were not subject to industry review and comment and did not specify implementation dates. As a result, implementation in the

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field by NRC examiners occurred at various times -- much to the surprise of some licensees. The NRC staff recognizes that this caused considerable confusion and frustration with licensees and NRC examiners and I have been advised that because of this problem, such informal revisions to the examiner standards will not be issued in the future.

Currently, it is expected that the examiner standards will be revised on an 18-month cycle, based upon lessons learned during the actual administration of exams and industry comment. The 18-month frequency has been established to ensure that improvements identified by both the NRC and industry are incorporated in a timely manner and, at the same time, provide sufficient time for licensees to implement the revisions.

When the staff initially issues a revision to the examiner standards in draft form, it will be subject to industry comment and then revised and reissued in final form. This part of the process will take anywhere from three to six months. When the revision is reissued in final form, an implementation date will be established, typically about 3 months later. Licensees who, after the implementation date, receive the usual 90-day letter announcing the NRC's intent to administer requalification examinations will be required to comply with the revised standards. Thus, the time from final issuance of the revised standards to administration of the first exams where compliance with the revised standards will be mandatory will be approximately 6 months. Licensees may, of course, implement revised standards earlier on a voluntary basis.

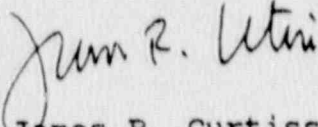
With respect to revision 7 of the examiner standards, it is my understanding that this revision will primarily address changes to the initial examination process and not the requalification process. The initial examination process will employ job performance measures similar to those that have been tried and proven successful in requalification exams. I understand that the industry has been highly supportive of this initiative. Revision 7 will be subjected to the review and comment process described above. Additionally, in parallel with review and comment, revision 7 will be implemented on a pilot basis, similar to the way that revision of the requalification examination process was handled. Consistent with the 18-month revision cycle, revision 7 is not scheduled to be issued in final form until January 1992, at the earliest.

I trust that this information responds to the concerns that you raised. I appreciate your bringing this matter to my attention. If you have any further thoughts or questions, please feel free to contact me or the staff. I firmly believe that with continued

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dialogue on this most important subject, we can continue to improve the process for administering operator licensing examinations, in a manner that will provide the necessary stability for the industry while, at the same time, permitting continued refinement and improvement in the process.

Most sincerely,


James R. Curtiss