

June 28, 1982

TO: F.J. Remick  
FROM: B.K. Hajek *BKH Hajek (Perm)*  
D.W. Miller *DW Miller*  
SUBJECT: SECY 82-232, Use of Non-Plant Specific Simulators

At your request, we have completed a detailed review of SECY-82-232. This review has also included several telephone conversations with J.L. Milhoan of your office, and one conversation with D.H. Beckham, Acting Chief, Operator Licensing Branch (OLB).

SECY-82-232 contains one major conclusion, that is, that "the information gained from a non-plant specific simulator [does not provide] a basis to accurately judge the ability of competence of an operator with sufficient confidence to justify denial of a license." We agree with this conclusion and the rationale presented to justify it for the examinations currently being given. We also agree with the implied conclusion that examinations administered on plant specific simulators are able to provide a measure of an operator's competence.

Therefore, we recommend the Commissioners approve the Staff's recommendations that non-plant specific simulator examinations be terminated immediately. Plant specific simulator exams should be continued. Further, OLB should devote personnel resources conserved in the short run (next 60 days) to the development of new procedures and exam forms for use in conducting simulator and oral exams for those plants having plant specific simulators. The total length of the simulator plus oral (plant walk-around) exam for license candidates at these plants should not significantly (20% to 25%) exceed the length of the oral exam for license candidates at plants without a plant specific simulator. The new procedures would otherwise impose an unfair burden on potential operators at plants with simulators. Consideration should be given to whether CRGR should review these procedures.

SECY-82-232 also includes one recommendation to begin an OLB administered requalification program to examine at least 20% of all currently licensed operators at each plant each year. This is in response to an earlier Commission directive, and is made in SECY-82-232 to be implemented in conjunction with the elimination of non-plant specific simulator exams, which would free personnel to switch tasks.

We concur, as previously stated, that non-plant specific simulator examinations should stop immediately. However, we recommend that OLB administered requalification examinations should not begin until October 1, 1982. In the interim, OLB manpower should be utilized to consider and develop objectives and procedures for the requalification examination program, and to assure these objectives and procedures are dis-

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tributed to and discussed among all examiners and examinees prior to implementation of the program. This should be facilitated by the planned OLB Examiner's Conference the week of September 20, 1982.

Paragraph 2 (a "note") under Recommendations implies that actual plant startups may be employed in the future for plants without simulators. This seems to be "arm twisting" to impose a requirement for plant specific simulators without rulemaking. Thus we believe a rulemaking should be considered to overtly require plant specific simulators by some reasonable date, such as 1987, for all plants with the exception of the few facilities below about 100 MWe.

To facilitate such a rulemaking, studies being done should include an analysis of topics or tasks which may be performed on non-plant specific simulators for examination purposes, and the validity of those examinations. We would anticipate that if such examinations could be given, they would be limited in scope compared to those currently being given. An alternative approach would be to provide a program to formally monitor the simulator training programs for those units without simulators.

Finally, we recommend that it should be made clear that the implementation of the single recommendation in SECY-82-232 is a one year plan, and OLB manpower shall be devoted to the several studies identified in the document to assure they will be completed by July 1, 1983.

In summary, our conclusions and recommendations are:

1. Non-plant specific simulator examinations as presently constituted are of little value for evaluating potential operators, and should be abandoned immediately as an examination tool.
2. Plant specific simulators should continue to be used for new and replacement examinations, and after October 1, 1982 for requalification examinations.
3. The Operator Licensing Branch should develop objectives, procedures, and new forms immediately to assure near equivalency between the oral examinations at plants with and without simulators.
4. Requalification examinations should not be implemented until after October 1, 1982, to provide sufficient time for OLB to develop objectives and procedures, and to disseminate them to all examiners and to all examinees.
5. The NRC should consider a rulemaking to require plant specific simulators for all plants except for the several unique low power facilities. Simulators should be required by about 1987. For those plants without simulators by that time, an OLB study should provide an analysis of those tasks that might legitimately be tested on a non-plant specific simulator, or a strategy for monitoring the simulator training programs for those plants.



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

Enclosure  
ACTION - Denton  
Cys: Dircks  
DEDO  
Rehm  
GCunningham  
Thompson  
DBeckham

*file  
8/2/82*

August 3, 1982

OFFICE OF THE  
SECRETARY

MEMORANDUM FOR: William J. Dircks, Executive Director  
for Operations  
FROM: *John C. Hoyle*  
John C. Hoyle, Acting Secretary  
SUBJECT: SECY-82-232 - USE OF NON-PLANT SPECIFIC  
SIMULATORS FOR INITIAL, REPLACEMENT, AND  
REQUALIFICATION EXAMINATIONS FOR LICENSED  
REACTOR OPERATORS AND SENIOR OPERATORS

This is to advise you that the Commission (with all Commissioners agreeing) has approved your recommendations that:

- (1) for power reactors with a plant-specific simulator, continue the requirements of a simulator licensing exam of all new and replacement candidates and require, for the NRC-administered requalification exam, a simulator exam of at least 20% (per year) of the currently licensed operators, and
- (2) for power reactors without a plant-specific simulator, require an operating test (oral exams) in accordance with 10 CFR §55.23 as well as a written exam of all new and replacement candidates and require, for the NRC-administered requalification exams, oral and written exams of at least 20% (per year) of the currently licensed operators.

The Commission indicated that written exams are important in the assessment of operator qualifications and should not be deleted. Written exams of at least 20% (per year) of the licensed operators should be added to the simulator exam of at least 20% (per year) of the licensed operators for NRC requalification testing for plants with plant-specific simulators.

In addition, the Commission approved the two recommendations of OPE (July 6 memo). In response to this approval you should:

CONTACT:  
A. Bates (SECY)  
41400

*82-10190-152  
PDR*

Rec'd OYL EDO  
Date 8-4-82  
2:45

- (1) Prepare procedures that assure near equivalency between examinations at plants with and without simulators; and
- (2) describe, as part of your July 1983 status report to the Commission on the staff program for improving the examination process, the experience gained in implementing SECY-82-232, and provide recommendations for any changes in the examination process based on such experience.

The Commission also requests that you consider rulemaking to require plant specific simulators and include a recommendation in your next status report.

(~~EDD~~) (SECY SUSPENSE: July 1, 1983)  
NRR

cc: Chairman Palladino  
Commissioner Gilinsky  
Commissioner Ahearne  
Commissioner Roberts  
Commissioner Asselstine  
OGC  
OPE



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

October 12, 1982

To: All Power Reactor Applicants and Licensees

Subject: Reactor Operator and Senior Reactor Operator Requalification  
Examinations (Generic Letter No. 82-18)

Gentlemen:

This letter is to inform you that NRC-administered requalification examinations for licensed reactor operators and senior reactor operators will begin at your facility sometime after October 1, 1982.

Following the Three Mile Island Accident, the Commission directed the staff to administer examinations as part of the requalification program for all licensees and applicants. In response to SECY 82-232, "Use of Non-Plant-Specific Simulators for Initial, Replacement, and Requalification Examinations for Licensed Reactor Operators and Senior Operators," the Commission approved staff recommendations regarding the use of simulators for requalification examinations. A copy of SECY 82-232 is attached for your information. To implement these directives, the NRC staff intends to conduct requalification examinations at your facility. The procedures for the requalification examinations are still under development and review. Additional information will be provided to you later this year.

Subject to timely approval of the procedures for conducting the requalification examinations, we intend to administer a written and an operating examination to at least 20% of your licensed personnel per year. In this way, all licensed personnel will be examined at least every five years and the impact on your requalification training program will be minimized. Detailed schedules will be worked out with your training staff. The NRC plans on making two visits to your facility during the year for replacement examinations and one visit for requalification examinations. Therefore, scheduling of replacement and requalification examinations, including reexamination of failures will need to be closely coordinated to prevent the number of licensed operators from being reduced to unacceptable levels and to ensure timely reexaminations can be given.

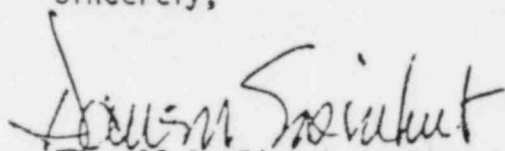
An objective written examination consistent with the scope of the requalification program required by Appendix A to 10 CFR Part 55 will be administered to selected licensed personnel. If your plant has a plant-specific simulator, an operating examination will be conducted on that simulator. Otherwise, an operating examination will be conducted at your facility. Unsatisfactory performance will necessitate removal from licensed duties and accelerated retraining in weak areas. This is consistent with your in-house requalification program currently in place. Reexamination by NRC may be required in unsatisfactory areas. Renewal licenses will continue to be issued to licensed personnel who are enrolled in your approved requalification program, provided the NRC requalification examinations do not indicate significant weaknesses in that program.

This program should not represent a significant departure from the requalification program you already have in place, since you are required to conduct examinations at the reactor operator or senior reactor operator level as part of that program. It will, however, provide the NRC and the public with additional assurance that continued operator training is effectively being conducted. We encourage you to submit training material and examination questions and answer keys to NRC for our use in developing examinations.

In addition, in response to SECY 82-232 the Commission removed the requirement for NRC conducted simulator examinations for those plants that do not have plant specific simulators. The NRC staff is conducting an evaluation of the role of simulators in training and examinations to be completed by July 1983. When this study is completed, we intend to incorporate any changes into revisions to 10 CFR Part 55, Regulatory Guide 1.8 or into new regulatory guides, if necessary. Until then, the requirements for requalification training in Appendix A to 10 CFR Part 55 and NUREG-0737 remain in effect. You should refer to NUREG-0094 and Regulatory Guide 1.8 for additional guidance on initial and requalification training.

You will be contacted at a later date to schedule requalification examinations. If you have any questions on this program, please contact Mr. Don H. Beckham of the NRC's Division of Human Factors Safety at (301)492-4868.

Sincerely,



Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation

Enclosure:  
SECY 82-232