

November 16, 1990

Mr. Tom Tipton
Director, OMSS Division
NUMARC
1776 I Street, N.W.
Washington, DC 20006

Dear Tom:

As we discussed, the Operator Licensing Branch (OLB) has resolved an apparent oversight on SRC eligibility requirements that was published in June 1990 in Revision 6 of the Operator Licensing Examiner Standards (NUREG-1021).

The attached resolution is effective immediately and will be published as an errata change to the examiner standards. All Regional offices have been notified of this change. This guidance can be forwarded by you to facility personnel as appropriate.

If you have any questions, please do not hesitate to call me at (301)492-1014.

Sincerely,

Robert M. Gallo, Chief
Operator Licensing Branch
Division of Licensing Performance
and Quality Evaluation
Office of Nuclear Reactor Regulation

Enclosure:
As stated

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PROPOSED REVISION TO ES-202, REV 6

Change the wording of ES-202, Paragraph C.1.a:

- a. Minimum of 4 years of responsible power plant experience as defined in paragraph A.2.c. above, Revision 2. Of this, 2 years shall be nuclear power plant experience.

Rationale: Paragraph A.2.c already defines responsible power plant experience, including the two-for-one substitutions. Adding more words here only serves to create confusion.

Change the wording of ES-202, Paragraph C.1.b:

- b. Actively involved in the performance of licensed reactor operator duties at the facility for which the license is sought for at least one year.
 1. A 4-year degree in Engineering or equivalent (engineering technology or physical science degrees which include course work in physical, mathematical or engineering sciences; Professional Engineer's (PE) license obtained by successful completion of the PE examination) may be substituted for this license requirement.
 2. One year or greater as an active, licensed reactor operator at a comparable facility (same vendor, similar vintage) or eighteen months at a non-comparable commercial power reactor may be substituted for this license requirement. Sufficient details of this experience must be provided in the application in order for the NRC to make a judgement regarding equivalence.
 3. Two years or greater as one of the military positions equivalent to a licensed operator (as noted in paragraph A.2.c) may be substituted for this license requirement. Sufficient details of this experience must be provided in the application in order for the NRC to make a judgement regarding equivalence.
 4. Experience obtained in licensed positions (or their equivalent) on other large scale reactors may be justified and authorized on a case-by-case basis. Sufficient details must be provided in the application to judge the equivalency of this experience and a waiver request will be required for this eligibility requirement in this situation.

Rationale: RG 1.8, Rev 2 clearly describes the requirement that an individual have either an engineering degree or be licensed and actively performing the duties of a licensed reactor operator for at least one year in order to sit for an SRO license. Though the RG is not explicit in stating where the licensed experience is to be obtained, it does clearly state that the bases for additions and exceptions to ANS3.1, 1981 are contained in NUREG-0737 (including the March 28, 1980 Denton letter) and other documents. Within this document is Item 1.A.2.1, "Immediate Upgrading of Reactor Operator and Senior Reactor Operator Training and Qualifications" which lists the 1 year RO requirement for an SRO candidate. It is very clear in the discussion

that this 1 year be obtained at the site at which the license is sought. It does allow accepting equivalent experience if the individual was licensed at another nuclear power plant or military propulsion reactors (on a 1-for-1 basis).

The reason for the .75 and .5 ratios for non-comparable commercial power reactor and military experience respectively, is based on current ANS-3.1 guidance (1987 for commercial experience and 1981 for military experience). ANS-3.1, 1981 does not provide guidance on how to accept experience from other utilities, while the 1987 version does. Even though the 1987 version has not been endorsed by the NRC, this is a reasonable approach and helps clarify what is considered equivalent experience in these situations.

It is also important to note that the ANS-3.1, 1981 requirements for experience imply directly that the individuals RO experience is at the site at which the license is sought and that the INPO Guidelines for Qualification Programs (83-022 and 85-025) both explicitly state that 6 months of the required 12 months as an RO is to be obtained at the facility for which the license is sought.

Change the wording of paragraph C.2.b:

- b. If any of the experience substitutions in C.1.b.1, 2, 3 or 4 is used (applicant has not held a reactor operator license at that site) then the training requirements of B.2.d through B.2.f must be met and satisfactory completion of a training program that is comprehensive in its coverage of both RO and SRO knowledges, skills and abilities. These applicants will be examined as SRO Instant candidates.

Rationale: This requirement is intended to ensure that any individual that sits for a SRO examination that does not have 1 year as an RO at that facility will have the proper training to account for this missing experience and that he will be evaluated on board manipulation (RO) skills during the NRC licensing examination.