APPENDIX B

NRC ADMINISTERED REQUALIFICATIONS

The NRC Staff will request each facility's schedule for its requalification program, including classroom, inplant and simulator training dates and written, oral and simulator examination dates (same as A). Based upon Regional Administrator input, LER history, SALP evaluations and recent operator licensing and requalification examination results, and training program accreditation, the staff will select which facilities to visit. During this visit the staff will have several options available to evaluate the strengths and weaknesses of the facility requalification program. Among these options are: (1) Substitute an NRC developed examination or section of the exam for the facility developed examination; (2) conduct NRC oral/simulator examinations on the candidates; and/or (3) observe facility administered oral/simulator written examinations on subject areas determined by the NRC. The base program would have the NRC visit all of the facilities over the first two year period (FY 1983, FY 1984) and administer written examinations to approximately 50% of the facilities visited. Adjustments to this base could be made as resources and results dictate. Training program effectiveness would be based upon the overall results of the examination with individual weaknesses being addressed by the facility administered retraining program.

Evaluation

1. Is the evaluation effective?

   Yes. A mixture of written and oral or simulator examinations will be given to determine requalification program effectiveness and pinpoint deficient areas. The examinations would be administered as part of the approved requalification program.

2. Are results reliable?

   Yes. The NRC administered portions of the annual requalification examination will be of the same type and format used in initial licensing examination and facility requalification examinations. The exam will be given in lieu of all or part of the facility examination. Therefore, there will be no problems with familiarity or style. This will lead to results indicative of program quality.

3. Is the program flexible?

   Yes. Based on licensing results and Regional recommendations, the requalification examination can be administered either in specific areas or across the board. This will allow Regional Administrators to focus resources on known or suspected problem areas and reduce the impact on programs with no indication of problems.

4. Can it be conducted within resources and existing regulations?

   Yes. The program is flexible enough to focus significant resources on problem areas while staying overall within allocated resources.

Resource Requirements

This option is expected to lessen the NRC and contractor support efforts and resources, and minimizes the overall utility impact as compared to (Alternative A). Utility efforts and overall impact would not greatly increase as it will be part of their present annual requalification examination process and will be coordinated with their present schedule for requalification exams. Simultaneously, it will provide the opportunity for the examiner to evaluate the training staff and the training efforts (methods) for the administration of the overall requalification program examination.

It is difficult to estimate needed resources for this option as it would be highly dependent upon the actual number of written examinations required to be administered, i.e., the number of facilities that exhibit requalification program deficiencies as determined by the NRC and selected for the full NRC examination, or sections of an NRC written examination.

Assumptions:
1) The NRC administer option B type requalification program to 50% of the utilities in calendar year 1983, FY 1984 and thereafter.

2) One full week of examiner effort is expended at each utility. This would yield on the average (depending on the number of operators at a utility) approximately 20% of the operators being examined at each utility.

Considering the most resource intense case in which 50% of the plants would be selected and given full NRC examination of both written and orals or simulator exams, the estimate of total resources required is 10.5 PSY, $30,000 per plant per year and a total of $1,080,000 total users fees.

APPENDIX C

RELICENSING ON A PERIODIC BASIS

NRC licenses would be valid for a period of five years with complete NRC reexamination required for relicensing. Operators with licenses due to expire the following year would be administered an examination in conjunction with the scheduled replacement examinations at a given facility. Weak individuals would require subsequent NRC reexamination.

Evaluation

1. Is the evaluation effective?

   It is an effective periodic evaluation of individual operator knowledge. However, it provides no feedback at all on the requalification program. We anticipate that the utility would remove an operator due for relicensing from shift duties and place him in special training prior to the exam. Therefore, it would only evaluate the special training, not requalification training.

2. Are results reliable?

   Yes. The results would have the same reliability as the initial licensing examination.

3. Is the program flexible?

   No. All operators would be relicensed regardless of previous performance, operating history or indications of problems. This could easily lead to loss of significant numbers of licensed operators due to the added burden. We believe that this would also impose a significant burden on each operator. No other profession requires complete relicensing examinations which could result in loss of the license. This would be viewed as being particularly onerous by the operators and industry.

4. Can it be conducted within resources and existing regulations?

   #### Resources

   Yes, if the workload is evenly distributed. However, there is a potential for significant numbers of licensees to come up for reexamination in one year and for a few to expire the next, making consistent staffing levels difficult to achieve.

   #### Regulations

   No, rewording and rule change of 10 CFR Part 55 would be necessary to accommodate the periodic relicensing of operators.

Resource Requirements

Scheduling of exams would be difficult and highly dependent upon the peaks and valleys created at the various utilities as to when the licenses of the operators actually expired. The number of exams scheduled would fluctuate in coincidence with the required license exam surges. Resources would have to be available to accommodate the (worst case) peak exam requirements; therefore, creating inherent slack times and inefficient use of NRC resources during these times, i.e., a given year may require the administration of many exams with following year requiring few.

Assuming that the exam created by this option could be equally averaged out over the five (5) year period; based upon the number of plants (72), and the number of operators affected per yr/plant (10), the expected NRC efforts, resources, etc., and utility impact, license recovery fee costs, etc., would be virtually identical to those as calculated in Alternative A.

This option appears to be the least controllable and the least efficient use of both the NRC and utility resources. Utility license fee recovery costs would be highly variable depending on their needs at a given time.

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

MAY 10 1983

MEMORANDUM FOR: Darrell G. Eisenhut, NRR
Edward L. Jordan, IE
Richard E. Cunningham, NMSS
Denwood F. Ross, RES
Clemens J. Heltemes, Jr., AEOD
Joseph Scinto, ELD

FROM: Victor Stello, Jr., Chairman
Committee to Review Generic Requirements

SUBJECT: CRGR MEETING NUMBER 39

The Committee to Review Generic Requirements (CRGR) will meet on Wednesday, May 25, 1983 from 1-4 p.m. in Room 6507 MNBB. The meeting agenda is as follows:

1:00 - 2:00 p.m. - As requested by RES, M. Ernst will present for CRGR review, the enclosed proposed amendment to 10 CFR 71 to make it compatible with the 1983 transportation regulations of the International Atomic Energy Agency and the U.S. Department of Transportation. (Category 2 item).

2:00 - 4:00 p.m. - As requested by RES, M. Ernst will present for CRGR review, the enclosed proposed rule 10 CFR 50.60 titled, Reduction of Risk from Anticipated Transients Without Scram (ATWS) Events for Light-Water Cooled Nuclear Power Plants. (Category 2 item)

Persons making presentations to the CRGR are responsible for (1) assuring that the information required for CRGR review is provided to the Committee (CRGR Charter - IV.B), (2) coordinating and presenting views of other offices, (3) as appropriate, assuring that other offices are represented during the presentation, and (4) assuring that agenda modifications are coordinated with the CRGR contact (Walt Schwink, x24342) and others involved with the presentation. With regard to attendance at CRGR meetings, I request that Office Directors limit attendance of their staffs at CRGR meetings to those few senior staff needed to address the agenda item under discussion.

MAY 10 1983

As a minimum, Division Directors or higher management should attend meetings addressing agenda items under their purview.

Victor Stello, Jr., Chairman
Committee to Review Generic Requirements

Enclosures: As stated

cc: SECY (w/encl)
Commission
W. Dircks
Office Directors
Regional Administrators
G. Cunningham
M. Ernst

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