

August 18, 1997

Dr. Wade J. Richards
Chief, Nuclear Licensing and Operations
5335 Price Avenue
McClellan Air force Base
McClellan AFB, California 95652-2504

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING THE McCLELLAN
NUCLEAR RADIATION CENTER REACTOR OPERATOR REQUALIFICATION
PLAN (TAC NO. M96343)

Dear Dr. Richards:

We have reviewed the proposed licensee Operator Requalification Plan dated July 7, 1997 for the McClellan Nuclear Radiation Center (MNRC) reactor. The plan was submitted as part of the documentation needed to license the MNRC. During our review of the requalification plan, questions have arisen for which we require additional information and clarification. Please provide responses to the enclosed Request for Additional Information within 30 days of the date of this letter. Following receipt of the additional information, we will continue to evaluate the requalification plan. If you have any questions on this review, please contact me at (301) 415-1833.

This requirement affects nine or fewer respondents and, therefore, is not subject to Office of Management and Budget review under Public Law 96-511.

Sincerely,

[original signed by]
Warren J. Eresian, Chief Examiner
Non-Power Reactors and Decommissioning
Project Directorate
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

Docket No. 50-607

Enclosure:
As stated

cc w/enclosure:
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 18, 1997

Dr. Wade J. Richards
Chief, Nuclear Licensing and Operations
5335 Price Avenue
McClellan Air force Base
McClellan AFB, California 95652-2504

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Sincerely,

A handwritten signature in cursive script, appearing to read "Warren J. Eresian".

Warren J. Eresian, Chief Examiner
Non-Power Reactors and Decommissioning
Project Directorate
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

Docket No. 50-607

Enclosure:
As stated

cc w/enclosure:
See next page

McClellan AFB TRIGA REACTOR

Docket No. 50-607

cc:

Dr. Wade J. Richards
SM-ALC/TI-1
5335 Price Avenue, Bldg. 258
McClellan AFB, California 95652-2504

Lt. Col. Marcia Thornton
HQ AFSC/SEW
9570 Avenue G., Bldg. 24499
Kirtland AFB, New Mexico 87117-5670

Col. Robert Capell
HQ AFMC/SGC
4225 Logistics Avenue, Suite 23
Wright-Patterson AFB, Ohio 45433-5762

REQUEST FOR ADDITIONAL INFORMATION
McCLELLAN NUCLEAR RADIATION CENTER REACTOR
OPERATOR REQUALIFICATION PLAN
DOCKET NO. 50-607

1. The regulations in 10 CFR 55.59(c)(1) require that a "requalification program must be conducted for a continuous period not to exceed two years." The MNRC definition of biennially does not conform to the intent of the regulation. Biennially should be redefined to mean every two years.
2. In Sections 4.2 and 4.3 add the following category for the written examinations, (see 10 CFR 55.59(c)(2)).
 - H. Applicable portions of title 10, Code of Federal Regulations.
3. In Section 5.1B, the use of the word "should" with regard to the written examinations, i.e., "Elements of either (1) or (2) should be adhered to," and "Examinations covering the categories (to the extent applicable in 4.2 or 4.3) should be administered..." needs to be changed to shall.
4. It is not clear what is meant by Section 5.1B.1. One could read this to mean that the requalification lectures will be given during a one time period rather than spread out as in Section 5.1B.2. If this is what is meant, please revise accordingly.
5. Section 5.1B.2 apparently allows an examination administered at the end of each major topic to replace a comprehensive requalification written examination every two years as required by 10 CFR 55.59(a)(2). While exams administered after each subject are useful in determining weaknesses, it should not substitute for the comprehensive written exam. This section should be revised to state that a comprehensive written examination shall be given at least biennially.
6. The oral examination requirements should be expanded in Section 5.1B.3 to list the applicable items in 10 CFR 55.45(a), (see 10 CFR 55.59(a)(2)(ii)).
7. Section 5.6 discusses how an individual is allowed to assume licensed duties if they have not actively performed licensed functions for a period in excess of four months. The section should be expanded to include the requirements of 10 CFR 55.53(f)(2), wherein an operator is required to perform a minimum of six hours of shift functions under the direction of an operator or senior operator.

8. Section 5.7 should be rewritten as follows:

An operator licensee preparing and giving the biennial written comprehensive and annual oral examinations shall be exempt from those examinations. However, an operator licensee shall not be exempt from the written and oral examinations for two consecutive iterations of the written or oral examinations.

9. Section 6.1B should be revised to remove the parenthetical statement (interval not to exceed 30 months). Also, there is an editorial typo in first word of this section.
10. On page 15, the paragraph titled Medication should be renumbered as 6 rather than 1.