



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 2, 2021

ORGANIZATION: National Organization of Test, Research, and Training Reactors

SUBJECT: SUMMARY OF PUBLIC MEETING ON JUNE 15, 2021, REGARDING RISK-INFORMING MEDICAL EXAM REQUIREMENTS FOR RESEARCH AND TEST REACTOR LICENSEES

On June 15, 2021, an Observation public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of the National Organization of Test, Research, and Training Reactors (TRTR) via webinar. The purpose of this public meeting was to discuss with the research and test reactor (RTR) community the Nuclear Energy Institute (NEI) comment received regarding Title 10 of the *Code of Federal Regulations* Section 55.33(a)(1) requirements for medical examinations for licensing of operators and possible options to risk-inform the medical examinations for licensing RTR operators. NEI provided the comment as part of the NRC's Retrospective Review of Administrative Requirements (RROAR) process. The meeting notice and agenda, dated May 27, 2021, are available in the NRC's Agencywide Documents Access and Management System (ADAMS) at Accession No. ML21147A491. The NRC and TRTR presentation slides are also available in ADAMS at Accession Nos. ML21166A165 and ML21165A059, respectively. A list of meeting attendees is provided as an enclosure to this summary.

NRC staff opened the meeting by welcoming attendees and detailing the structure of the meeting. NRC staff also presented the NRC's current legislative authority and regulatory framework, and an overview of the NRC's RROAR process (including an NEI letter dated May 6, 2020 [ADAMS Accession No. ML20128J340] and the NRC's response in SECY-21-0056 [ADAMS Accession No. ML21012A439]).

TRTR representatives presented comments and recommendations on the RROAR process, NRC Principles of Good Regulation, and their RROAR input and feedback. An NEI representative discussed the NEI letter dated May 6, 2020. Subsequently, TRTR representatives detailed three primary issues identified by RTR licensees regarding medical qualifications reporting and processes: evaluation of therapeutic and medical device usage, operator health assurance by licensee management, and NRC Form 396, "Certification of Medical Examination by Facility Licensee," submittal timelines. TRTR representatives presented their views on perceived training issues in interactions with the NRC, including issues with NRC residency requirements at the facility for applicants, NRC scrutiny on experience and education supplements for Senior Reactor Operator-Instant applicants, experience justifications required by the NRC, and the amount of time and required information for operator license renewals and new applicants. TRTR representatives also gave their views on perceived issues with the issuance of examination results and inspection reports from the NRC in a timely manner.

In closing their presentation, TRTR representatives emphasized that they viewed the RROAR initiative as a valuable route to change certain requirements, that the RTR operator licensing program is ready for transformation, and that they appreciated the opportunity to present observations and recommendations.

### Overview of Discussion Topics

To start the discussion portion of the meeting, NRC staff thanked the presenters for their words and explained that the scope of the discussion would be limited to the topics posted on the agenda, although the NRC recognized the importance of the other topics discussed by TRTR. The significant themes during the discussion were:

1. American National Standard Institute/American Nuclear Society (ANSI/ANS) standards and the role of ANSI/ANS standards in regulation of RTR facilities;
2. Interest in the NRC's review process for NRC Form 396;
3. Concerns about the challenges RTR facilities and applicants are facing relating to the scheduling of reactor operator exams;
4. Impact concerning timeliness of examination results; and
5. Duplication of NRC medical review officer efforts after an individual's physician examination with facility certification.

At the end of the discussion period, NRC staff offered potential paths forward through TRTR adoption and NRC endorsement of ANSI/ANS-15.4 or possibly a combination of these and other options through further discussion and collaboration between TRTR and NRC efforts. NRC staff closed the meeting by thanking everyone for the constructive conversations, reiterating that NRC management is committed to engaging on risk-informing the medical examinations for RTR operators and other topics.

Please direct any inquiries to me at 301-415-6202, or [Katie.Wagner@nrc.gov](mailto:Katie.Wagner@nrc.gov).

*/RA/*

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Enclosure:  
As stated

cc w/enclosure: See next page

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SUBJECT: SUMMARY OF PUBLIC MEETING ON JUNE 15, 2021, REGARDING RISK-  
INFORMING MEDICAL EXAM REQUIREMENTS FOR RESEARCH AND TEST  
REACTOR LICENSEES DATED: SEPTEMBER 2, 2021

**DISTRIBUTION:**

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**ADAMS Accession No. ML21195A140**

**NRC-001**

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DATE	07/15/2021	07/15/2021	07/15/2021	09/01/2021	09/02/2021

**OFFICIAL RECORD COPY**

LIST OF ATTENDEES

JUNE 15, 2021, MEETING WITH NATIONAL ORGANIZATION OF TEST, RESEARCH, AND

TRAINING REACTORS

REGARDING RISK-INFORMING MEDICAL EXAM REQUIREMENTS FOR

RESEARCH AND TEST REACTOR LICENSEES

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Note: Attendance list based on information from Microsoft Teams. List does not include at least three individuals that connected by phone.

\* = Meeting Facilitator

Enclosure