

Updates to Requalification Plan

Update: Redid numbering throughout the document. Removed “12.10” before the first paragraph. Replaced “12.10.1” with “1.,” “12.10.2” with “2.,” “12.10.3” with “3.,” “12.10.4” with “4.,” “12.10.5” with “5.,” “12.10.6” with “6.,” “12.10.7” with “7.,” “12.10.8” with “8.,” “12.10.9” with “9.,” “12.10.10” with “10.,” “12.10.11” with “11.,” and “12.10.12” with “12.”

Basis: The 12.10 numbering system references the corresponding section of the SAR that describes requalification. This Requalification Program is a stand-alone document, so its numbering does not need to match the SAR exactly.

Update: In 12.10, replaced “reactor operator” with “Reactor Operator.”

Basis: Implement consistent formatting throughout the document.

Update: In 12.10, removed “of the USNRC’s rules”.

Basis: Phrase is redundant.

Update: In 12.10, replaced “ANSI/ANS 15.4” with “ANSI/ANS 15.4-2016”.

Basis: This clarifies which version of the standard the Requalification Plan complies with.

Update: In 12.10.2, replaced “two years” with “two calendar years”.

Basis: This clarifies the implementation of the 24-month requalification cycle.

Update: In 12.10.3, Content, replaced “and annual operating examination” with “an annual operating examination”.

Basis: Correcting typographical error.

Update: ~~In 12.10.4, Annual Lectures, replaced “Annually, not to exceed 15 months,” with “Once per requalification cycle, lectures”~~ Moved “Emergency Response Plan and Physical Security Plan” to Section 12.10.5 “Biennial Lectures”. Removed the remaining text of 12.10.4. Retitled this section “Reserved” to retain numbering of following section.

Basis: This would make the timeframe consistent with ANSI/ANS 15.4-2016.

Update: In 12.10.5, Biennial Lectures, replaced “Biennially, not to exceed 30 months” with “Once per requalification cycle (i.e., in alternate calendar years)”.

Basis: This would make the timeframe consistent with ANSI/ANS 15.4-2016.

Update: In 12.10.6, Written Examinations, replaced “10 CFR 44.59(a)(2)(i)” with “10 CFR55.59”.

Basis: The previous reference contained a typo and was not general enough to include all relevant paragraphs of the regulation.

Update: In 12.10.6, replaced “shall formulate, administer, and grade the written examination” with “shall formulate the written examination”.

Basis: It should be permissible for an appointed representative to administer and grade the tests written by the lecturer.

Update: In 12.10.6, replaced “an examination in exempt” with “an examination is exempt”.

Basis: Correcting typographical error.

Update: In 12.10.6, replaced “will be proctored by the individual” with “will be proctored and graded by the individual”.

Basis: It should be permissible for an appointed representative to administer and grade the tests written by the lecturer.

Update: In 12.10.6, added the following statement after the first paragraph: “If an individual receives a Reactor Operator or Senior Reactor Operator license after the lectures have occurred for that calendar year, the written examination requirement will be waived until the following year.”

Basis: Passing the NRC exam satisfies the requirement to demonstrate knowledge of training material.

Update: In 12.10.6, Written Examinations, replaced “75% will constitute a passing grade” with “70% will constitute a passing grade”.

Basis: This would make the grading criteria consistent with ANSI/ANS 15.4-2016 Section 6.2.2, “This examination shall be...evaluated in the same way as the initial licensing examination”. The NRC-administered written examination requires 70% on each section to pass.

Update: In 12.10.6, third paragraph, replaced “This accelerated retraining program will be left the discretion of the Reactor Supervisor.” with “This accelerated retraining program will be left to the discretion of the Reactor Supervisor.”.

Basis: Correcting typographical error.

Update: In 12.10.7, replaced “a reactor operator” with “Reactor Operators and Senior Reactor Operators.”

Basis: Implement consistent formatting throughout the document; adding Senior Reactor Operators to reduce repetitive wording (see next Update).

Update: In 12.10.7, removed the first paragraph break (combining first two paragraphs) and removed the following sentence: “To maintain a current license, each calendar quarter a senior reactor operator shall operate the reactor for a minimum of four (4) hours and perform a supervised startup, including a core excess measurement and increase to power.”

Basis: Adding a reference to Senior Reactor Operators in the previous sentence keeps the intent of the requirement while reducing repetitive wording (see previous Update).

Update: In 12.10.7, replaced “For senior reactor operators, direct supervision of theme operations” with “For Senior Reactor Operators, direct supervision of these operations”.

Basis: Correct typographical error; implement consistent formatting (capitalization) throughout the document.

Update: In 12.10.7, added the following: “Passing an NRC exam for a Reactor Operator or Senior Reactor Operator license satisfies the licensed hours requirement for that quarter.”

Basis: This is allowed for power reactor operators. See NUREG-1262, “Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators’ Licenses,” Question #293.

Update: In 12.10.7, final paragraph, replaced “reactor operator or senior reactor operator” with “Reactor Operator or Senior Reactor Operator,” and replaced “the operator or senior operator” with “the Reactor Operator or Senior Reactor Operator”.

Basis: Implement consistent formatting throughout the document.

Update: In 12.10.8, replace “reactor operator or senior reactor operator” with “Reactor Operator or Senior Reactor Operator” in the first and second paragraphs (two instances).

Basis: Implement consistent formatting throughout the document.

Update: In 12.10.8, replaced “administered by the Reactor Supervisor” with “administered by the Duty SRO”. Also removed the following: “Successful complete is left to the discretion of the Reactor Supervisor. The annual operating exam for the Reactor Supervisor shall be administered by a senior reactor operator.”

Basis: Any SRO is qualified to administer the exam to any other licensed RO or SRO. It is most appropriate for the Duty SRO to directly administer the exam, as it includes part of daily operations.

Update: In 12.10.8, added the following to the end of the first paragraph: “Passing an NRC exam for a Reactor Operator or Senior Reactor Operator license satisfies the operating exam requirement for that calendar year.”

Basis: Passing the NRC exam satisfies the requirement to demonstrate operating proficiency.

Update: In 12.10.8, replaced “10 CFR 55.5(4)(iii) and (iv)” with “10 CFR 55.45”.

Basis: Previous citation referred to a nonexistent section. Operating tests are described in 10 CFR 55.45.

Update: In 12.10.9, replaced “reactor operators and senior reactor operators” with “Reactor Operators and Senior Reactor Operators”.

Basis: Implement consistent formatting throughout the document.

Update: In 12.10.9, Medical Certification, replaced “biennially, not to exceed two and a half (2.5) years” with “biennially, no later than the last day of the 12th month of the second year”.

Basis: This change would make the timeframe consistent with ANSI/ANS 15.4-2016.

Update: In 12.10.10, replaced “operators” with “Reactor Operators and Senior Reactor Operators”.

Basis: Implement consistent formatting throughout the document.

Update: In 12.10.10, replaced “This includes, but is not limited to, 50.59 Safety Evaluations, Reactor Operation Committee Approval Sheets, and Information Bulletins described in the OSTR Operating Procedures.” with “This includes, but is not limited to, 50.59 Screens and Evaluations.”

Basis: Information Bulletins and Reactor Operation Committee Approval Sheets are no longer used at the OSTR. Operators are required to sign Screens and Evaluations performed under 50.59.

Update: Removed the text of 12.10.11. Retitled this section “Reserved” to retain numbering of following section. Removed text is as follows:

“Approval

At the conclusion of the annual reactor operator requalification program, the Reactor Operations Committee shall review the results for each operator. Upon approval by the ROC, the operators may resume licensed duties for the next annual cycle.”

Basis: The requalification program is under the direct oversight of the Reactor Supervisor, who reports its completion to the Reactor Administrator. The program’s records are regularly inspected by a Nuclear Regulatory Commission inspector. Approval by the Reactor Operations Committee is an unnecessary and redundant step, and it can be eliminated without decreasing the effectiveness of the requalification plan. Implementation of the plan is also audited by the Reactor Operations Committee annually.

Update: In 12.10.12, replaced “reactor operator or senior reactor operator” with “Reactor Operator or Senior Reactor Operator” and replaced “surrendered” with “terminated”.

Basis: Implement consistent formatting throughout the document; clarify wording.