

U.S. NRC public meeting with the National Organization of Test, Research, and Training Reactors on Operator Licensing Training

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Discussion of Operator Licensing Training Concerns Provided by the National Organization of Test, Research, and Training Reactors

November 5, 2021

Non-Power Production and Utilization Facilities Oversight Branch
Division of Advanced Reactors and Non-Power Production and Utilization
Facilities

Office of Nuclear Reactor Regulation
ADAMS Accession No. ML21320A353

Today's Meeting

- Purpose
 - To discuss TRTR comments during the June 15, 2021, public workshop on operator training requirements
- Goals
 - Obtain clarity of NRC training requirements for licensed operators
 - Identify suggested alternative training requirements
 - Alignment on path forward / next steps

NRC Presentation Agenda

- TRTR comments
- Ongoing NRC Activities
- Operator Licensing Requirements
- Feedback and questions

TRTR Operator Licensing Comments

- Concerns with NRC residency requirement at the facility
- NRC scrutiny on nuclear experience and education for SRO-I
- Experience justification required by NRC
- Amount of time for new and renewal document processing
- Inspection reports not received in a timely manner

TRTR Operator Licensing Comments (cont.)

- Concerns with NRC residency requirements
 - One year at the facility prior to application; inferred eligibility requirements for all candidate types
 - SROI waiver for less than a year disputed
 - TRTR previously provided that power reactors do not have one year requirement for SROI

TRTR Operator Licensing Comments (cont.)

- NRC scrutiny on SROI nuclear experience
 - 3 years of nuclear experience being scrutinized by NRC
 - 2 years of academic training can be substituted for 2 of the 3 years nuclear experience allowed
 - ANSI/ANS 15.4 nuclear experience can be many related activities
 - TRTR believes facility management should be able to make the SROI determination

TRTR Operator Licensing Comments (cont.)

- Experience justification required by the NRC
 - TRTR says reactor management should determine an individual's qualification status
 - NRC asked for required additional information not relevant to nuclear experience; results in delays in application process and examinations and TRTR feels this is burdensome
 - TRTR stated that NRC reviewers cannot make qualification statements; TRTR believes it should be up to licensee if their candidate(s) has enough experience and training to sit for operator license examination

TRTR Operator Licensing Comments (cont.)

- Amount of time for new and renewal document processing
 - Burdensome
 - Disrupts mission
 - Staffing issues
 - Timely renewal should be ‘frozen’
 - Inconsistency on NRC staff required information

TRTR Operator Licensing Comments (cont.)

- Inspection reports from the NRC were not received in a timely manner

Ongoing Activities

- Document process improvements and enhanced tracking
- Revision to NUREG-1478
- ANSI/ANS 15.4 Working Group Participation
- White paper on Medicals for Operator Licensing

Discussion

- The NRC is interested in any additional information, specific examples, and feedback regarding the operator licensing issues and concerns, such as:
 - Does the current process meet your needs?
 - Hurdles encountered?
 - Other concerns?
 - Ideas for possible flexibilities or improvements to the current approach?