



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

December 6, 2021

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

SUBJECT: SUMMARY OF PUBLIC MEETING ON NOVEMBER 5, 2021, WITH THE NATIONAL ORGANIZATION OF TEST, RESEARCH, AND TRAINING REACTORS ON OPERATOR LICENSING FOR RESEARCH AND TEST REACTORS

On November 5, 2021, an Observation 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)/TRTR additional operator licensing training and experience comments and concerns received during a June 15, 2021, public meeting regarding operator licensing medical requirements. During the meeting, the NRC and TRTR agreed to hold a separate public meeting on these issues. The meeting notice and agenda, dated October 21, 2021, are available in the NRC's Agencywide Documents Access and Management System (ADAMS) at Accession No. ML21294A352. The NRC's and TRTR's presentation slides are available at ADAMS Accession Nos. ML21320A353 and ML21320A348, respectively. A list of attendees is provided as an enclosure to this summary.

For background related to the June 15, 2021, meeting, refer to: (1) the public meeting notice dated May 27, 2021, which is available at ADAMS Accession No. ML21147A491; (2) the meeting summary, dated September 2, 2021, available at ADAMS Accession No. ML21195A140; and (3) the NRC's and TRTR's presentation slides, dated June 15, 2021, available at ADAMS Accession Nos. ML21166A165, and ML21165A059, respectively.

The NRC opened the meeting by welcoming attendees and outlining the structure of the meeting. Additionally, the NRC staff presented their understanding of TRTR/NEI's comments and concerns about operator licensing training and experience raised during the June 25, 2021, public meeting.

The TRTR representatives presented five operator licensing training and experience concerns within the context of NRC Principles of Good Regulation and NRC's risk-informed regulatory processes. An NEI representative discussed the NRC Public Workshop (public meeting) held on June 15, 2021. The TRTR Chair, requested additional clarity on several topics: (1) the application submittal to the NRC's medical review officer; (2) the NRC endorsement of American National Standards Institute/American Nuclear Society (ANSI/ANS)-15.4-2016 in a regulatory guide; and (3) the NRC Form 396, "Certification of Medical Examination by Facility Licensee," 14-day timeliness issue in the next revision of NUREG-1478, "Operator Licensing Examiner Standards for Research and Test Reactors." An update on the Draft White Paper/future Interim Staff Guidance from the previous meeting was requested by another TRTR member. The TRTR representatives detailed five primary issues identified by RTR licensees regarding training issues: (1) residency at the facility; (2) senior reactor operator-instant application

scrutiny; (3) experience justifications; (4) required information for license renewals; and (5) timeliness of renewals/new licenses.

During the closing of their presentation, the TRTR representatives emphasized that they viewed the Operator Licensing Program as ripe for transformation and improvement and that they appreciated the opportunity to present observations and recommendations.

Overview of Discussion Topics

To start the discussion portion of the meeting, the NRC staff thanked the presenters for their comments and observations and explained that the scope of this meeting would be to understand and gather the details presented in order to move forward with plans to address the comments, and concerns. The significant topics during the discussion were:

1. The ANSI/ANS-15.4 working group and the role of ANSI/ANS standards in regulation of RTR facilities

The NRC staff recommended the current ANSI/ANS-15.4 working group collaboration, which includes TRTR and NRC members, as a path to resolve medical issues discussed in the June 15, 2021, public meeting.

2. Interest in the NRC's update of NRC Forms 396 and 398

The NRC stated that updates to NRC Forms 396 and 398 intended to provide better clarity will be available soon and will include some of the previously identified discrepancies between power reactors and RTRs (as necessary; when appropriate). The updates will also clarify instructions for the appropriate sections and will specify the information which is necessary to complete the forms.

3. NUREG-1478 update

The NUREG-1478 update, targeted to be available for public comment at the end of first calendar quarter of 2022, is intended to provide agility and clarity for many of the issues raised. The NRC welcomed TRTR input on the NUREG-1478 revision during the public comment period, and is specifically seeking input on TRTR community concerns raised on residency requirements, experience, and education justifications.

4. Timeliness of examination results

Examination result timeliness was raised as an issue of concern for TRTR and NRC. The NRC staff has implemented an improved tracking system and enhanced oversight accountability for operator licensing and examination documentation. It was noted by the NRC staff that improvements have already resulted in issuance of recent examination results at around 60 days, significantly less than the 90-day goal. Additionally, the NRC staff commented that the 90-day goal was established to accommodate examinations with a large number of candidates and that most examination results have historically been processed at around 60 days. The TRTR representatives discussed a desire to achieve a 30-day goal for issuance of examination results. The NRC staff committed to continue efforts to improve efficiency in the process and discussed that several factors can impact the timeliness for providing examination results, (quality of facility training program, frequency of facility exams, number of

examiners and number of requested exams, success/failure of the candidates). The TRTR representatives raised the possibility of proposing a standardized training program that could be endorsed by the NRC similar to the process used for power reactors. The NRC staff responded that it would engage with the TRTR community to pursue a standard training program for reactor operators at non-power production reactor facilities if the community pursues that option.

5. White Paper—Timing of response

The White Paper that will address risk-insights to the requirements for medical evaluations is projected to be completed late January 2022. The NRC staff expects to engage the TRTR community in mid-January regarding timing for holding a meeting to discuss the topic.

The NRC staff stated that this meeting was valuable because it leads to increased awareness of the TRTR's comments, observations, and suggestions and this awareness will bring about additional discussion and collaboration between TRTR and NRC so that they can agree on mutually advantageous solutions.

At the end of the discussion period, the NRC management communicated that it is mindful and grateful of TRTR's recognition that the NRC staff adheres to the NRC's Principles of Good Regulation. The NRC management closed the meeting by thanking everyone for the constructive conversation, and reiterated that the NRC staff are committed to engaging with the TRTR about their comments and concerns, within the confines of the Atomic Energy Act and applicable regulatory requirements.

Please direct any inquiries to me at 301-415-3398, or Cindy.Montgomery@nrc.gov.



Signed by Montgomery, Cynthia
on 12/06/21

Cindy Montgomery, Project Manager
Non-Power Production and Utilization
Licensing Branch
Division of Advanced Reactors and Non-Power
Production and Utilization Facilities
Office of Nuclear Reactor Regulation

Enclosure:
As stated

SUBJECT: SUMMARY OF PUBLIC MEETING ON NOVEMBER 5, 2021, WITH THE NATIONAL ORGANIZATION OF TEST, RESEARCH, AND TRAINING REACTORS ON OPERATOR LICENSING FOR RESEARCH AND TEST REACTORS DATED: DECEMBER 6, 2021

DISTRIBUTION:

PUBLIC
MDeSouza, NRR
JNguyen, NRR
WSchuster, NRR
CMontgomery, NRR
TTate, NRR
NParker, NRR
SAnderson, NRR
JBowen, NRR
JBorromeo, NRR
MShams, NRR
RidsNrrDanuUnpo Resource
RidsNrrDanu Resource
RidsOgcMailCenter Resource

ADAMS Accession No. ML21323A047

NRC-001

OFFICE	NRR/DANU/PM	NRR/DANU/LA	NRR/DANU/CE
NAME	CMontgomery	NParker	MDeSouza
DATE	11/22/2021	11/22/2021	11/23/2021
OFFICE	NRR/DANU/BC	NRR/DANU/BC	NRR/DANU/PM
NAME	TTate	JBorromeo	CMontgomery
DATE	12/2/2021	12/6/2021	12/6/2021

OFFICIAL RECORD COPY

LIST OF ATTENDEES

NOVEMBER 5, 2021, MEETING

WITH NATIONAL ORGANIZATION OF TEST, RESEARCH, AND TRAINING REACTORS

REGARDING THE TEST RESEARCH AND TRAINING REACTOR OPERATOR LICENSING

COMMENTS AND CONCERNS FOR RESEARCH AND TEST REACTOR LICENSEES

<u>Name</u>	<u>Organization</u>
Jeffrey Geuther	TRTR Chair/Pennsylvania State University
Justin Hudson	TRTR/National Institute of Standards and Technology
Jonathan Wallick	TRTR/U.S. Geological Survey
Scott Lassell	TRTR/North Carolina State University
Thomas Newton	TRTR/National Institute of Standards and Technology
Corey Hines	Washington State University
Ethan Taber	Missouri University of Science and Technology
Robert Agasie	University of Wisconsin - Madison
Bruce Meffert	University of Missouri – Columbia
Siaka Yusuf	Dow Chemical Company
Stylianos Chatzidakis	Purdue University
Les Foyto	University of Missouri – Columbia
Hilary Lane	Nuclear Energy Institute
Mohamed Shams	U.S. Nuclear Regulatory Commission
Jeremy Bowen	U.S. Nuclear Regulatory Commission
Shaun Anderson	U.S. Nuclear Regulatory Commission
Travis Tate	U.S. Nuclear Regulatory Commission
William Schuster	U.S. Nuclear Regulatory Commission
Michele DeSouza	U.S. Nuclear Regulatory Commission
John Nguyen	U.S. Nuclear Regulatory Commission
Amy Beasten	U.S. Nuclear Regulatory Commission
Dan Hoang	U.S. Nuclear Regulatory Commission
Tuan Le	U.S. Nuclear Regulatory Commission
Joshua Borromeo	U.S. Nuclear Regulatory Commission
Cindy Montgomery	U.S. Nuclear Regulatory Commission
Xiaosong Yin	U.S. Nuclear Regulatory Commission
Paulette Torres	U.S. Nuclear Regulatory Commission
Shakur Walker	U.S. Nuclear Regulatory Commission

Note: Attendance list based on information from Microsoft Teams.

Enclosure