



HITACHI

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December 3, 2021

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555-001

Subject: Response to NRC Request for Additional Information Regarding Operator
Requalification Program

References: 1) NRC License R-33, Docket 05000073, General Electric Hitachi (GEH)
Nuclear Test Reactor (NTR)
2) Letter, Requalification Program for the General Electric Nuclear Test
Reactor (NTR), dated 6/21/2021 (ML21172A185)
3) Letter, D. A. Hardesty (NRC) to M.F. Feyrer, GE-Hitachi Nuclear Energy
Americas LLC – Request for Additional Information Regarding Renewal of
Facility Operating License No. R-33 (EPID: L-2020-RNW-0038), dated
11/2/21 (ML21301A218)

Attached find a copy of GEH responses to supplemental information requested in NRC letter dated November 2, 2021 (Reference 3) regarding the NTR license operator requalification program, submitted on June 21, 2021 (Reference 2) as well as a complete revision of the operator requalification program.

If you have any questions regarding this matter, please contact me at (925) 918-6116.

Sincerely,

David
Heckman

Digitally signed by
David Heckman
Date: 2021.12.03
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David J. Heckman, Site Regulatory Affairs / Licensing Lead
Vallecitos Nuclear Center

Attachment 1: GEH Response to Request for Additional Information for NTR Licensed Operator
Requalification Program

Attachment 2: Requalification Program for the General Electric Nuclear Test Reactor –
December 2021

cc: NRC Region IV Administrator
D. A. Hardesty, NRC NRR/DANU/UNPL
DJH 21-006

Attachment 1:
**GEH Response to Request for Additional
Information for NTR Licensed Operator
Requalification Program**

GEH Response to Request for Additional Information for NTR Licensed Operator Requalification Program

DOCUMENT PURPOSE:

This document is an accompanying document to the revised GE-Hitachi Licensed Operator Requalification Program for the General Electric Nuclear Test Reactor (NTR) and serves as a “roadmap” to identify changes made to the program submitted to the NRC on June 21, 2021 in response to the NRC’s request for additional information on November 2, 2021

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1.0 RAI-1

Revise the GENTR Requalification Program to ensure that no one licensed individual is exempt from meeting the requirements of 10 CFR 55.59, or justify why the current plan is acceptable (e.g., the addition of a requirement that exam preparation is rotated among the licensed operators in an annual basis).

Response:

Section B.2.a., “Biennial Written Examination,” item 3, first sentence: the Manager NTR has been removed and replaced with “examination administrator” to eliminate the appearance that the Manager, NTR alone can grade examinations.

Section B.2.b., “Annual Operating Test,” item 7, was deleted to illuminate ambiguity and redundancy.

Section B.6., “Records,” item a, third sentence, was deleted as it was ambiguous and did not pertain to records.

Section C., “Program Administration,” item 1, was edited to ensure the duties of biennial test administration is rotated between licensed operators so that no one individual can go untested for more than one consecutive test cycle and no single individual is exempt from meeting the requirements of 10 CFR 55.59.

2.0 RAI-2

Revise the GENTR Requalification Program to include 10 CFR 55.43(b)(7), “Fuel handling facilities and procedures,” or specify how a senior reactor operator will be evaluated during an annual operating exam for 10 CFR 55.43(b)(7) or provide a

justification for how the GENTR Requalification Program meets the requirements of 10 CFR 55.43(b)(7).

Response:

Section B. “Program Description,” Item 2, a, 2), g, has been added to the biennial SRO examination includes questions about fuel handling facilities, equipment, and procedures.

3.0 RAI-3

Revise the GENTR Requalification Program to include medical examination requirements and that the medical examination period would not exceed the biennial medical examination requirement as stated in 10 CFR 55.21, or justify why the current plan is acceptable.

Response:

Section B., “Program Description,” item 2, c, “Biennial Medical Examination” has been added to Requalification Program and includes the requirement from 10 CFR 55.21 that licensed operators are examined by a physician every 2 years.

**Attachment 2:
Requalification Program for the General Electric
Nuclear Test Reactor – December 2021**