

U.S. NRC
UNITED STATES NUCLEAR REGULATORY COMMISSION
Protecting People and the Environment

TRTR Conference
Albuquerque, NM
October 1, 2024

Overview of NPUF Oversight Program

Travis L. Tate, Branch Chief
Non-Power Production and Utilization Facility Oversight (UNPO)

Meet the UNPO Branch Chief



Travis L. Tate

B.S. Nuclear Engineering, University of Tennessee, Knoxville

Science Applications International Corporation

- staff nuclear engineer supporting various Department of Energy activities at facilities in Oak Ridge, TN and Savannah River Site

Nuclear Regulatory Commission

- Operating Reactor Licensing Project Manager
- Rotation to Salem/Hope Creek Resident Inspector Office
- NRR Division & Office Technical Assistant
- NRR Branch Chief (license renewal, accident dose analysis, reactor licensing)
- Region I Acting Branch Chief
- NMSS Branch Chief
- UNPO since January 2020

UNPO Functions

Implements the NRC's safety and security inspection and operator licensing oversight programs for non-power production and utilization facilities (NPUFs) from initial licensing to decommissioning

Conducts review of NPUF security and emergency plans and coordinates event response activities

UNPO Staff

Travis Tate, Chief

Inspection Staff

- Craig Bassett
- Andrew Waugh
- Juan Arellano
- **Brian Lin**
- **Necota Staples**
- **Jonathan Braisted**
- **Jared Nadel**
- Michael Balazik – PM
- Kevin Roche - PM

Security Specialist

- **Thomas Eck**

Examiner Staff

- **John Nguyen - retired**
- Michele DeSouza
- Amy Beasten
- **Dan Hoang - transferred**
- Tuan Le
- **Timothy Ayres**
- **Margarette “Maggie” Goodwin**
- Paulette Torres – PM

Licensing Assistants

- Nicole Parker
- **Nia Jones – Operator Licensing**

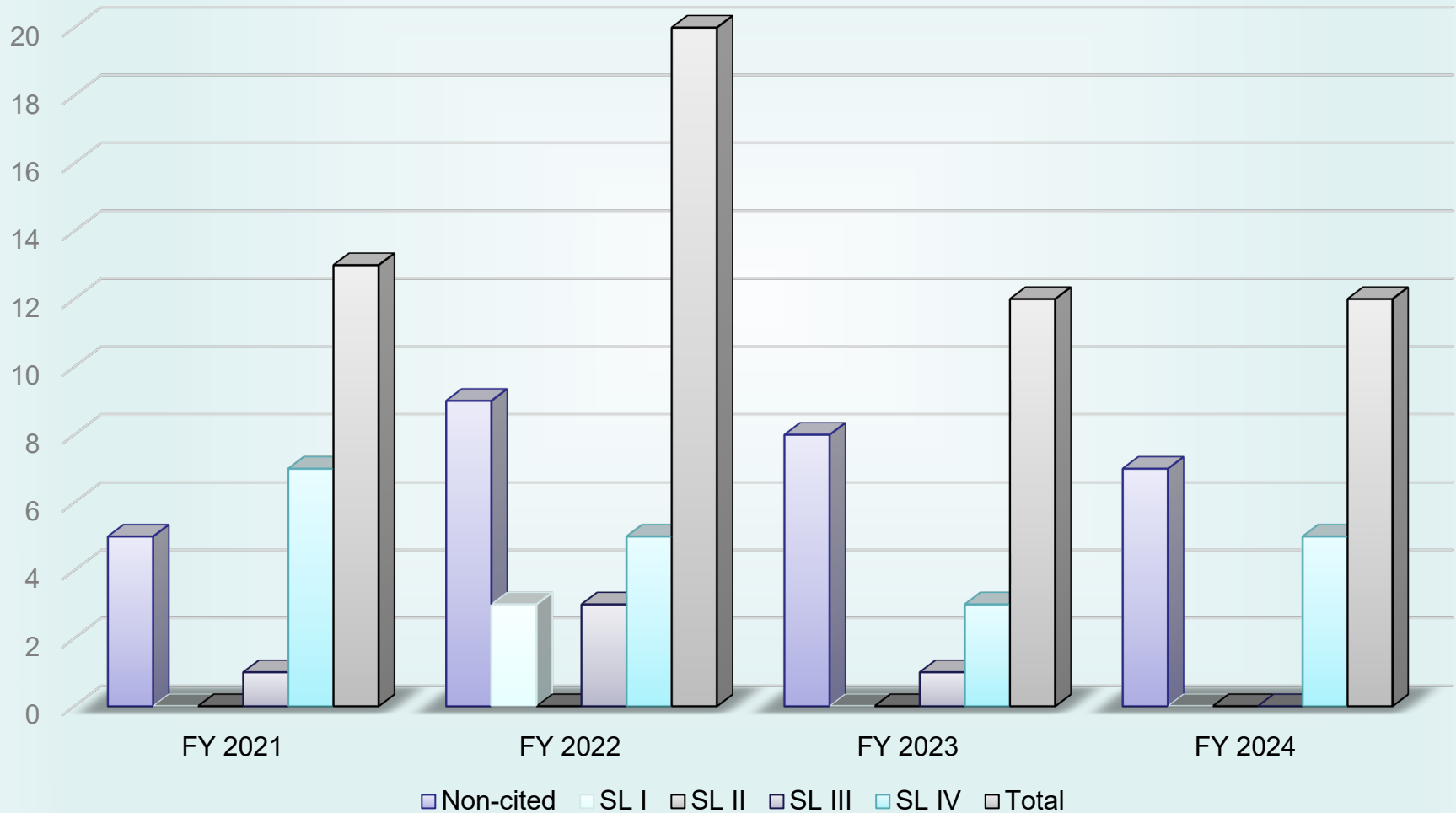
NPUF Inspection Program FY '24 Results

Inspection Manual Chapter 2545, “Research and Test Reactor Inspection Program”

- Completed 41 inspections
 - 12 Security inspections
 - 2 - Non-cited violations (NCV)
 - 2 - Severity Level (SL) IV, Notice of Violation (NOV)
 - 28 Safety inspections
 - 5 – NCV
 - 3 – SL IV NOV
 - Supplemental inspection
 - No violations

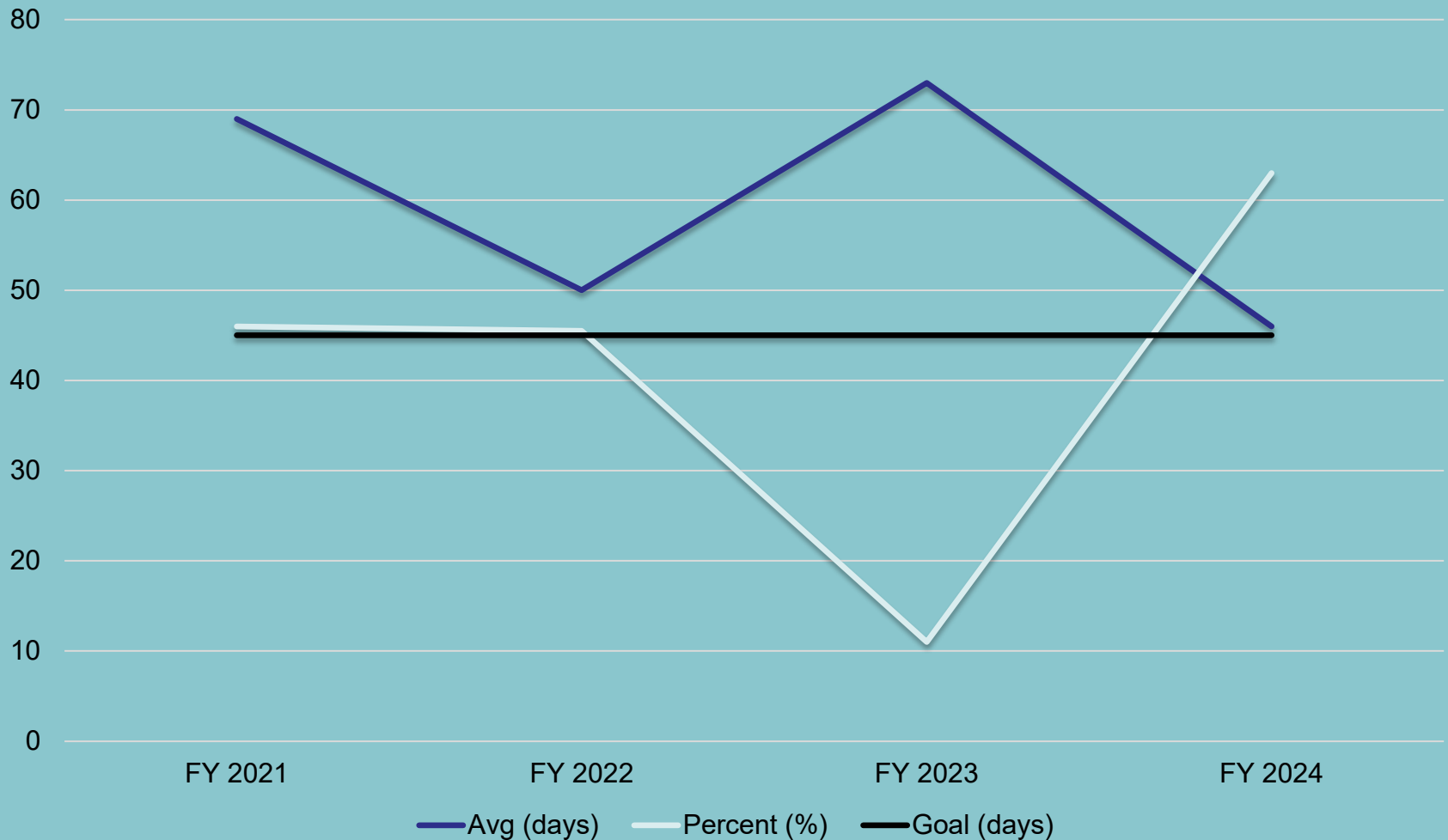
NPUF Inspection Program Violation Trend

Violations



NPUF Inspection Program Timeliness Trend

Inspection Report



NPUF Inspection Program Activities

- Guidance
 - Revised IMC 0615 “Research and Test Reactors Inspection Reports” (effective October 1, 2024)
 - Streamlined and standardized report language for efficiency
 - Formatted to allow use of Reactor Program System (RPS) report generator tool to improve efficiency
 - Removed inspection follow-up items and revised definition of unresolved items
 - Revised IMC 2550 “Non-Power Production and Utilization Facilities Licensed Under 10 CFR Part 50: Construction Inspection Program (CIP)” (effective May 16, 2024)
 - Incorporated lessons learned from SHINE and Vogtle 3 & 4 construction projects
- Access to inspection reports available on NRC website at:
<https://www.nrc.gov/reactors/non-power/inspection-reports.html>
- Inspection findings captured in RPS

NPUF Inspection Program Enhancements

- **Response to the Office of the Inspector General (OIG) Inquiry Report**
 - Emphasize direct observation of risk significant activities when scheduling inspections
 - Revise inspection guidance on safety and audit committee assessment
 - Enhance inspector qualification and refresher training on safety culture
 - Enhance inspector training on precursors to fuel damage
 - Develop public webpage for inspection reports and operational experience
 - Enhance the current annual licensing and oversight program review
 - Formalize periodic reviews of inspection guidance for NPUFs
- **Response to the OIG Audit of Inspection Program for Class II facilities**
 - Enhance guidance for creating, recording, and approving inspection hours in RPS
 - Enhance inspector training tracking
 - Conduct periodic reviews of inspector training program to reflect new training needs
 - Update plans and schedule for complete transition of program management to RPS
 - Enhance guidance for periodic review of inspection guidance

NPUF Inspection Program Enhancements (cont.)

- Oversight observations:
 - Implementation of Part 73 changes (Event Notifications)
 - Compliance date: January 8, 2024
 - This final rule modifies existing physical security event notifications, written follow-up reports, and recordkeeping regulations.
 - Changes to security plan and/or procedures should have already been made to include the new required notifications made to the NRC.
 - Event reporting
 - Fuel inspections
 - Material control & accountability (MC&A) inventory
 - Console key issues

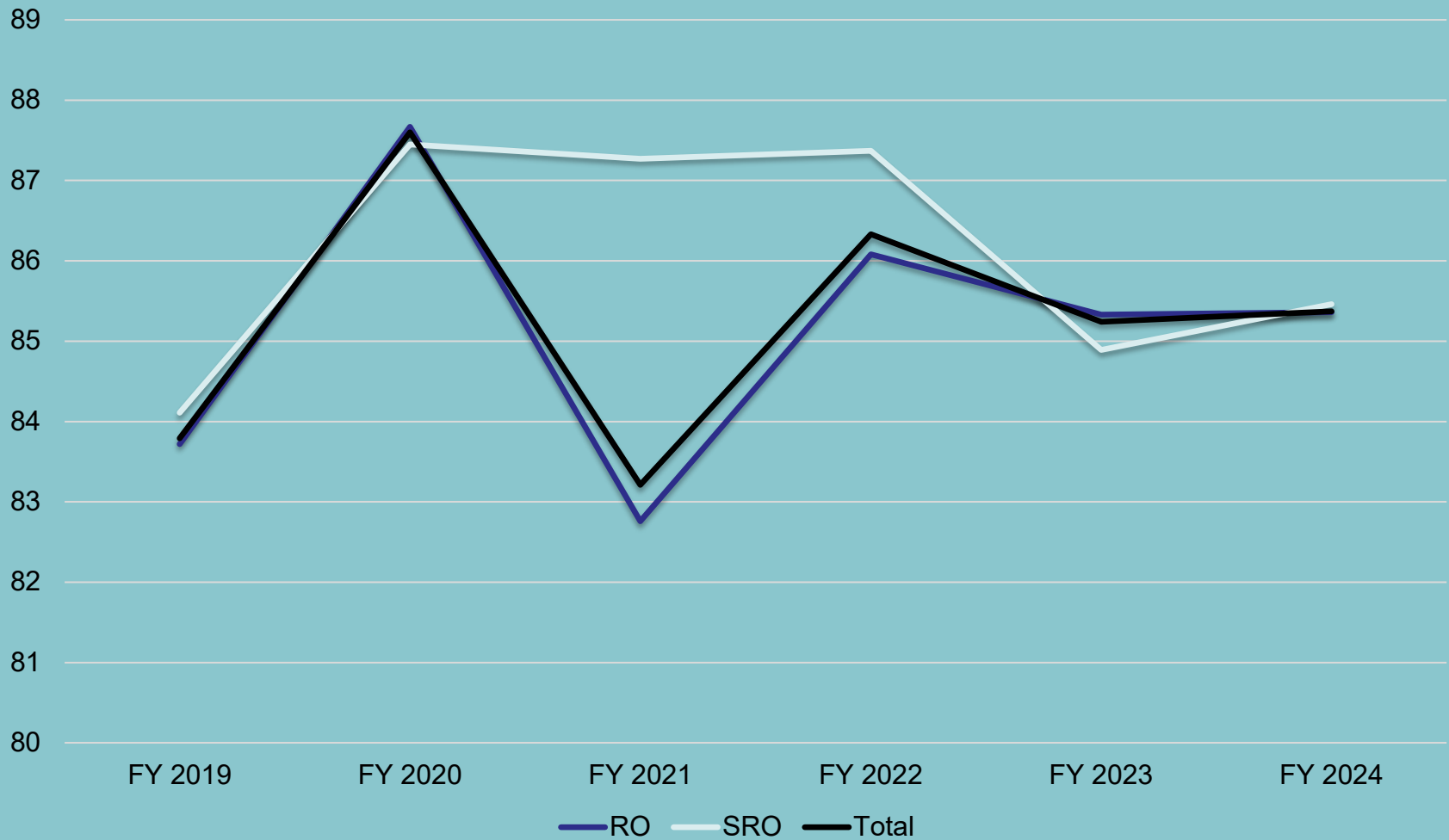
NPUF Operator Licensing Program – FY '24 Results

- 378 active operator licenses
 - 183 reactor operators (RO)
 - 195 senior reactor operators (SRO)
- 26 facility examinations conducted

Type	Total # of Written Exams	# of Written Exam Failures	(%)	Average Written Exam Grade	Average Written Failure Grade	Total # of Operating Exams	# of Operating Exam Failures	(%)
NEW	72	10	13.89%	85.33	74.38	72	3	4.17%
REAPP	2	0	0.00%	86.45		0	0	0.00%
RO	74	10	13.51%	85.36	74.38	72	3	4.17%
NEW	11	2	18.18%	85.31	70.00	11	1	9.09%
REAPP	2	0	0.00%	86.30		0	0	0.00%
UPGRADE	10	0	0.00%			10	2	20.00%
SRO	23	2	8.70%	85.46	70.00	21	3	14.29%
Total for HQ:	97	12	12.37%	85.37	73.65	93	6	6.45%

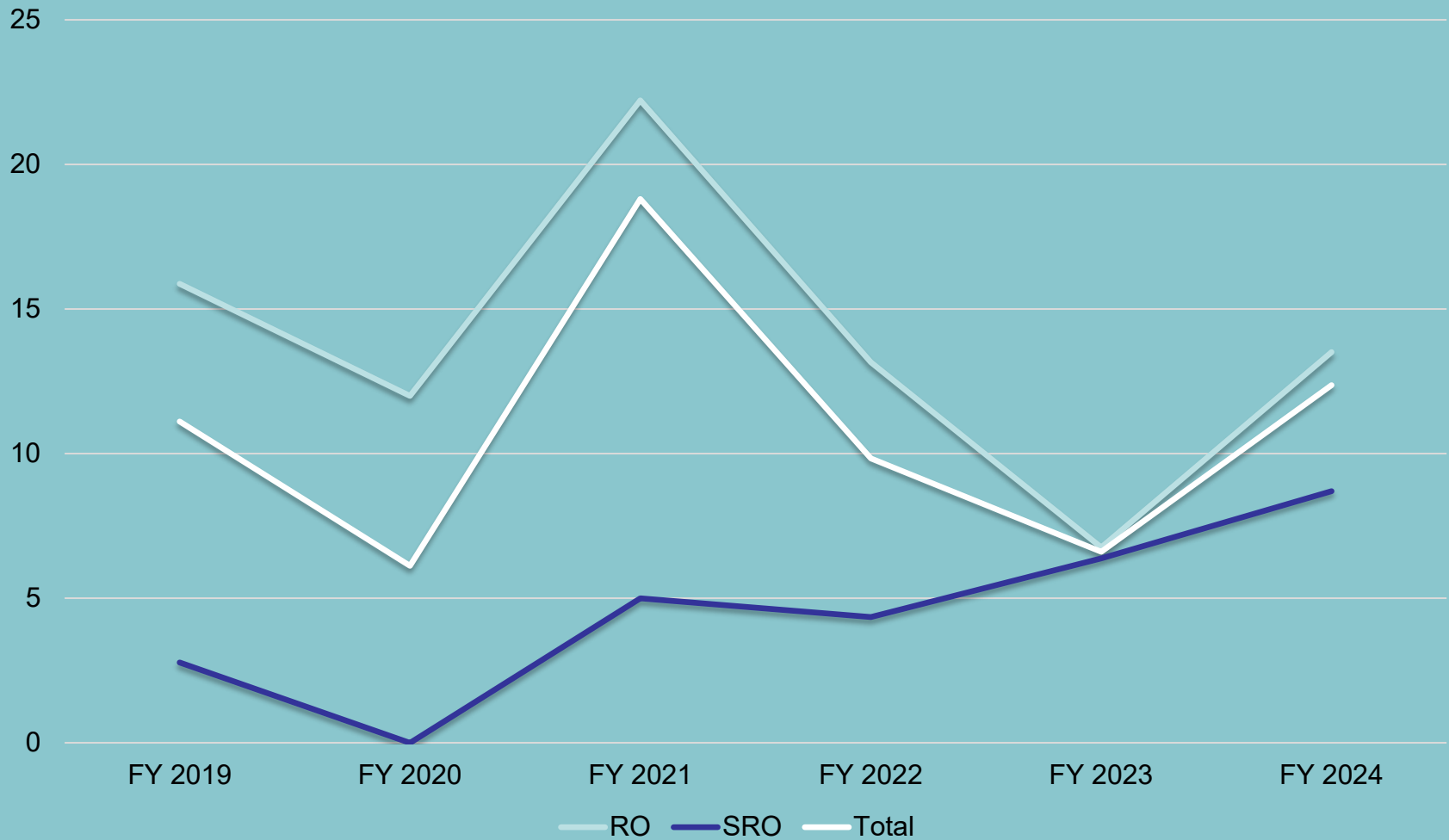
NPUF Operator Licensing Program - Trend

Average Written Exam Grade



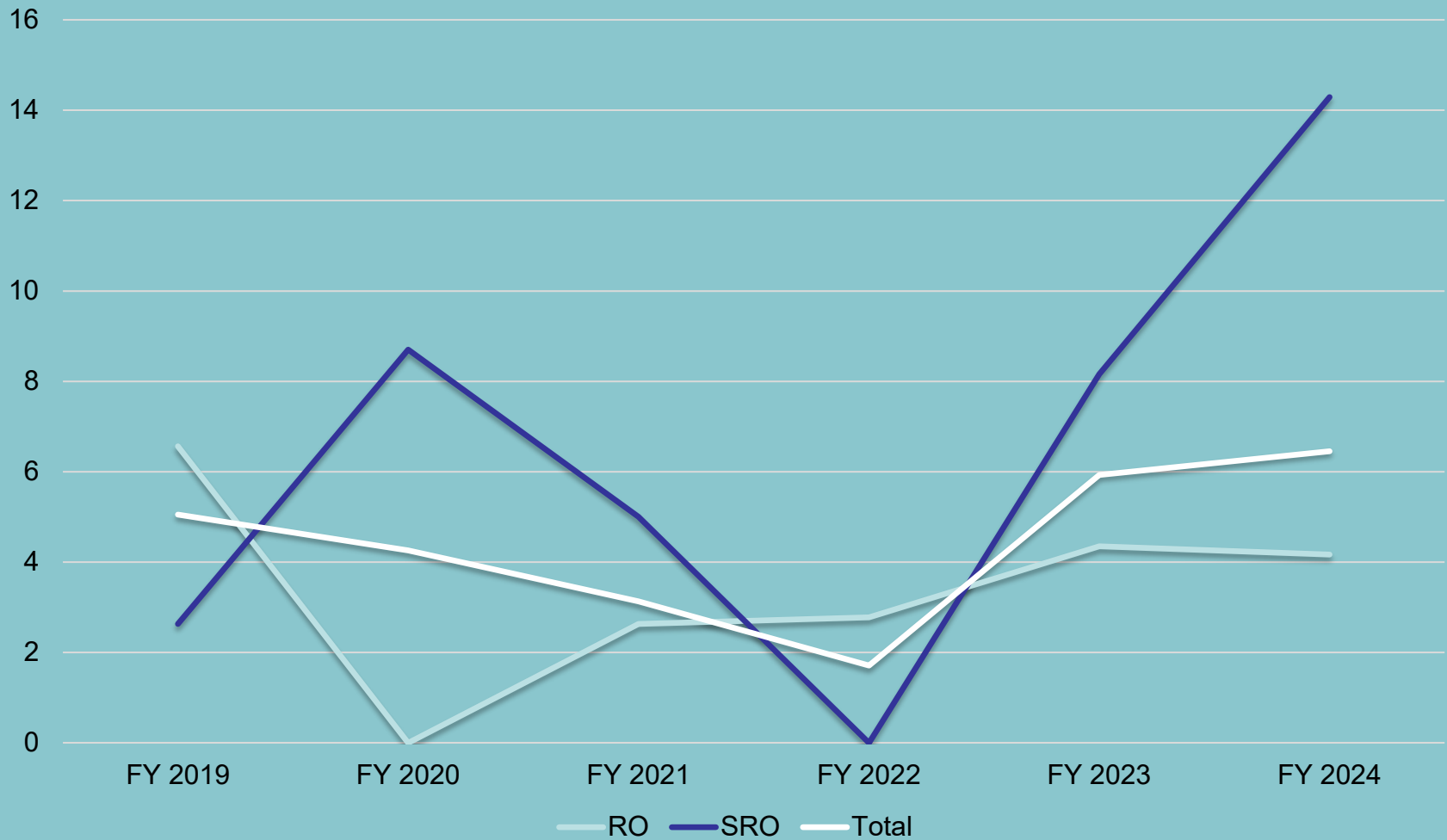
NPUF Operator Licensing Program - Trend

Written Exam Failures (%)



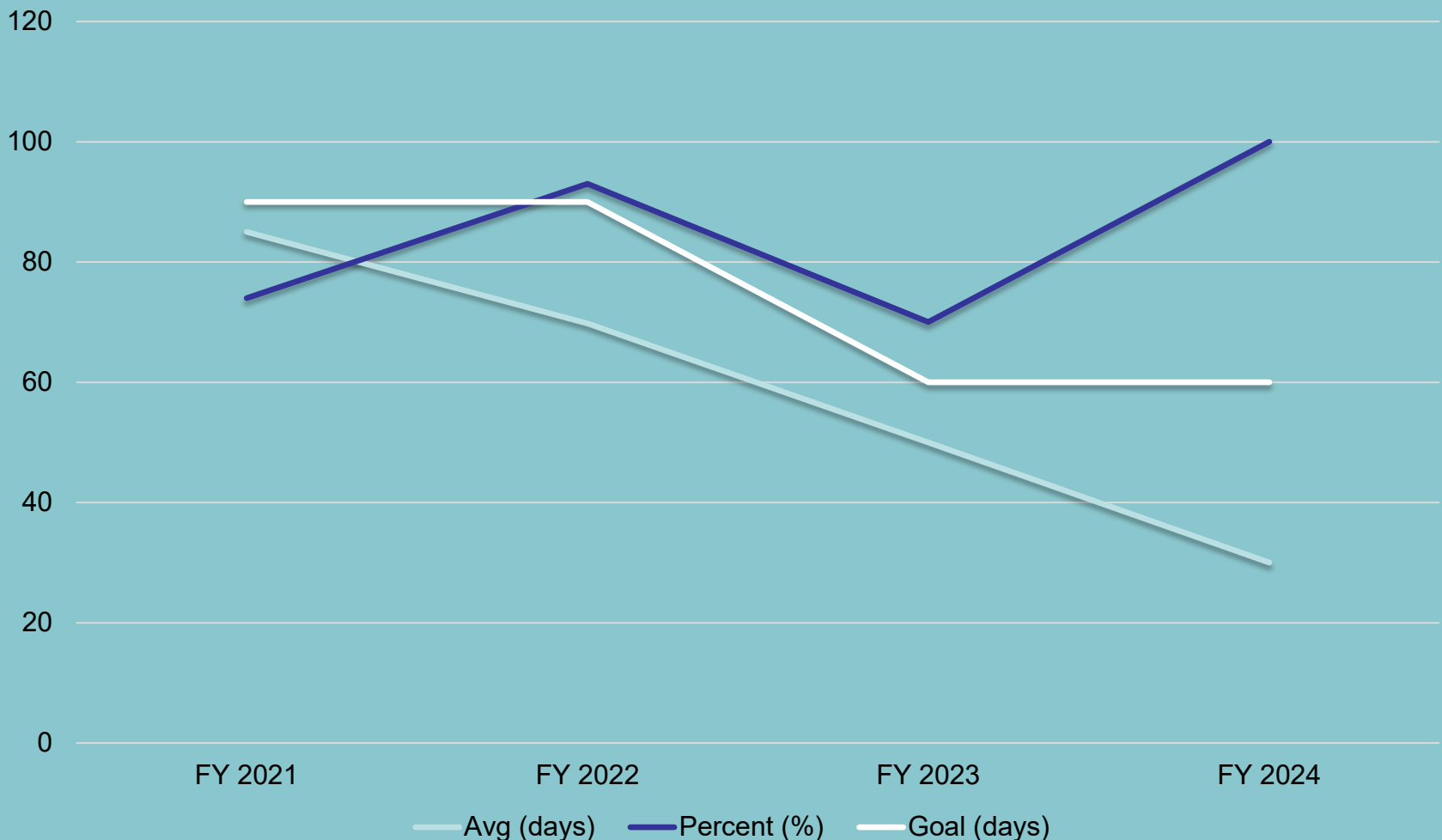
NPUF Operator Licensing Program - Trend

Operating Exam Failures (%)



NPUF Operator Licensing Program Timeliness Trend

Examination Results



NPUF Operator Licensing Program Activities

- Eliminated licensed operator certificate backlog
- Reduced termination letter backlog
- Improved licensed operator data in Operator Docket Database (ODD) and RPS – Operator Licensing (RPS-OL)
- Conducted workshop on NRC Form 396/398
- Reduced use of waivers/excusals

NPUF Operator Licensing Program Enhancements

- Revision 3 to NUREG 1478
 - Clarifying language for 1 year facility experience
 - Clarifying guidance on timing of actions (examination confirmations, application submittals)
 - Clarifying guidance on use of waivers, deferrals, excusals
- Collaborative Learning Environment (CLE) tool
 - Written examinations in CLE question bank
- ODD replacement project
- Observations
 - Outdated NRC Form 396/398
 - Renewal applications & timely renewal provisions
 - Pre-examination schedule confirmations
 - Pre-examination coordination of operational restrictions

Contact Info:

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Non-Power Production and Utilization Facility Oversight Branch

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Event Notification Regulations

Travis Tate

Key Dates

- Rule published in the Federal Register
 - March 14, 2023 (88 FR 15864)
- Effective date: April 13, 2023
- Public Meeting for NPUF licensees: May 10, 2023
- Compliance date: January 8, 2024
 - To date there has been no submission to the NRC for security plan changes under 10 CFR 50.54(p) or license amendments requests

New Regulations

10 CFR 73.71 is no longer applicable, nor is Appendix G

The following new regulations apply to NPUFs:

10 CFR 73.1200 - Notification of Physical Security Events

- The types of events may have changed
- The time for reporting has changed

10 CFR 73.1205 - Written Follow-up Reports of Physical Security Events

10 CFR 73.1210 - Recordkeeping of Physical Security Events

- This is a NEW requirement
- Discussions at the least two TRTR conferences discussed this new requirement



New Guidance Issued

RG 5.62, Revision 3 (ML23299A176)

Physical Security Event Notifications,
Reports, and Records

RG 5.87, Revision 0

Suspicious Activity Reports Under 10
CFR Part 73 (ML17138A384)



Summary

This final rule modifies existing physical security event notifications, written follow-up reports, and recordkeeping regulations, and adds new requirements for certain facilities or activities.

Changes to your security plan and/or procedures should have already been made to include the new required notifications made to the NRC