



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D. C. 20555

September 2, 1983

Honorable Nunzio J. Palladino
Chairman
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Dr. Palladino:

SUBJECT: ACRS REPORT ON TRAINING AND QUALIFICATION OF NUCLEAR POWER
PLANT PERSONNEL

During its 281st meeting, August 31-September 1, 1983, the Advisory Committee on Reactor Safeguards was briefed by the NRC Staff on proposed regulatory changes governing the training and qualification of personnel in nuclear power plants. These regulatory changes are required by Section 306 of the Nuclear Waste Policy Act of 1982. This matter was also discussed during meetings of the ACRS Subcommittee on Human Factors on June 30 and August 30, 1983. The Committee also had the benefit of the document referenced.

The NRC Staff has prepared a package of proposed rule changes and regulatory guides related to the qualification, training, and examination for licensing of personnel at nuclear power plants. We reviewed the package as a draft prior to its submission to the Commission. We understand that, if the Commission approves, the package will be issued for public comment later this year. Because of the limited time available, we were not able to make a detailed review of the proposed regulatory guides. We would like the opportunity for a more complete review following the public comment period.

Some salient features of the proposed package are the following:

- . With the exception listed below, the proposed changes will not extend licensing of individuals beyond the senior reactor operator (SRO) and reactor operator (RO) positions now requiring licenses. It will require each nuclear utility to develop a training program for all nuclear power plant personnel performing functions "important to safety." The definition of functions important to safety is broad and, in effect, appropriate training will be required for most licensee and contractor employees. A new regulatory guide will stipulate a "systems approach to training" to assure the desired quality and comprehensiveness. We endorse this approach.
- . Two classes of special SRO licenses will be created in addition to the regular license for the full SRO function. One will permit the holder to supervise only fuel handling and relieve him of some of the requirements for qualification and training required for a full SRO.

September 2, 1983

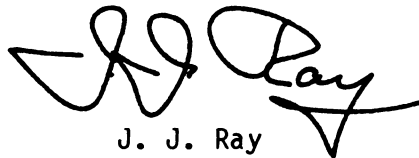
A second special class with similar features will be for an SRO instructor. We believe such division of responsibilities and qualifications may be reasonable and practical in many cases, but care must be exercised in administration. For example, it might be desirable to use titles that are more clearly functionally related.

- . Replica plant-specific simulators (now called plant-referenced simulators) will eventually be required for each nuclear power plant, although there may be some leeway for interpretation of how exact the replica must be. Formal requirements for simulators will emphasize their use as examination tools rather than training tools. The NRC Staff believes this is appropriate for administrative rather than technical reasons. We do not disagree and believe the simulators will be effective training tools as well.
- . There will be provision for initially certifying and then periodically recertifying simulators as adequately representing the nuclear power plant performance characteristics and the control room. The NRC Staff's primary concern for recertifying seemed to be with making sure the training simulator is kept consistent with plant modifications. We believe it is also important to assure that inadvertent changes or degradation in the simulator software or hardware do not affect its accuracy. A requirement for rather frequent performance testing with standard sequences might be considered as part of the package.

In addition to the comments above, we have a concern that the new package of regulations does not make adequate provision for "cold" licenses for operators. It appears there will remain a limited necessity for such licenses, and an acceptable basis for need and associated limitations must be clearly stated. We believe the rules should be clarified in this regard before being published for public comment.

We endorse the overall scope and direction of the proposed regulations, and believe they can make a substantial contribution to improved safety in nuclear power plant operations. With consideration of our comments above, we recommend that the package be approved for publication.

Sincerely,

A handwritten signature in black ink, appearing to read "J. J. Ray". The signature is stylized with a large, looped "J" and a cursive "Ray".

J. J. Ray
Chairman

Reference:

1. Draft memorandum from W. J. Dircks, EDO, NRC, to the Commissioners, Subject: Proposed Rulemaking for Operator Licensing and for Training and Qualifications of Nuclear Power Plant Personnel Performing Functions Important to Safety, dated August 16, 1983