



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

August 6, 2025

**MEMORANDUM TO:** James Anderson, Chief  
Operator Licensing and Human Factors Branch  
Division of Reactor Oversight  
Office of Nuclear Reactor Regulation

**FROM:** Jeff Correll, Reactor Engineer (Examiner)  
Operator Licensing and Human Factors Branch  
Division of Reactor Oversight  
Office of Nuclear Reactor Regulation

**SUBJECT:** SUMMARY OF JULY 24, 2025, PUBLIC MEETING WITH  
REPRESENTATIVES OF INDUSTRY

A handwritten signature in black ink, appearing to read "Jeff Correll".

Signed by Correll, Jeffrey  
on 08/06/25

On July 24, 2025, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting with representatives of the Nuclear Energy Institute's Licensed Operator Focus Group and other industry representatives.

The purpose of the meeting is for the NRC staff and industry representatives to discuss the topics of interest related to the NRC's Operator Licensing Program. Specifically, the NRC staff and industry representatives will discuss the licensing of senior reactor operators (SROs) as SROs limited to fuel handling, and miscellaneous topics.

**Enclosures:**

1. List of Attendees
2. Agenda
3. Discussion Summary

**CONTACT:** Jeff Correll, NRR/DRO  
(301) 415-2414

SUBJECT: SUMMARY OF JULY 24, 2025, PUBLIC MEETING WITH REPRESENTATIVES OF  
INDUSTRY DATE: August 6, 2025

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**ADAMS Accession No.:** ML25212A100      NRC-001

<b>OFFICE</b>	NRR/DRO/IOLB	NRR/DRO/IOLB
<b>NAME</b>	JCorrell	JAnderson
<b>DATE</b>	8/6/2025	8/5/2025

**OFFICIAL RECORD COPY**

LIST OF ATTENDEES – July 24, 2025, PUBLIC MEETING WITH REPRESENTATIVES OF INDUSTRY	
Name	Organization
Phil McKenna	NRC*
Bernard Litkett	NRC*
James Anderson	NRC*
Joey McPherson	NRC*
Anderson Wolfe	NRC*
Theresa Buchanan	NRC*
Amy Beasten	NRC
Heather Gepford	NRC
Heather Gepford	NRC
Jeff Correll	NRC
Lauren Nist	NRC
Matt Endress	NRC
Matt Endress	NRC
Matthew Emrich	NRC
Michele DeSouza	NRC
Mikhail Pellegrino	NRC
Paul Zurawski	NRC
Sarah Elkhiamy	NRC
Tony Brown	NRC
Tim Riti	Nuclear Energy Institute*
Kostas Dovas	Constellation Energy*
Tom Dean	Constellation Energy*
Megan Parlett	Constellation Energy*
Mike Schulte	Tennessee Valley Authority*
Josh Reuer	NextEra Energy*
Liberty Hernly	Arizona Public Service
Tracy Rychlik	Arizona Public Service

LIST OF ATTENDEES – JULY 24, 2025, PUBLIC MEETING WITH REPRESENTATIVES OF INDUSTRY

Name	Organization
Christopher Maxwell	Energy Northwest
Joey Fields	Entergy
Michael Martin	Entergy
Phil Harris	Entergy
Jesse Seymour	Florida Power and Light
Shaun Matthews	Florida Power and Light
Sheryl Sweet	Florida Power and Light
Timothy Ferrell	Florida Power and Light
Rachel Lynch	Kairos Power
Jodie Y. Olberding	Nebraska Public Power District
Mark Martellotta	NextEra Energy
Sean Wylie	NextEra Energy
Jim Schneider	NuScale Power
Pat Leary	NuScale Power
Mark Otten	Stars Alliance
Nicole Hill	Talen Energy
Mark Chitty	TerraPower
Mark Similey	TerraPower
Mark Verbeck	TerraPower
Brian Balzer	Unknown
Mark Wadusky	Unknown
Paul Williams	Unknown
Richard Drehs	Unknown

Note: An asterisk (\*) indicates attendance was in person. All other attendees participated via video teleconference.

AGENDA FOR THE U.S. NUCLEAR REGULATORY COMMISSION  
PUBLIC MEETING WITH INDUSTRY OPERATOR LICENSING REPRESENTATIVES  
Thursday, July 24, 2025  
09:00 a.m. to 10:30 a.m. Eastern Standard Time

Hybrid meeting

<u>TOPIC</u>	<u>PRESENTER</u>
Opening Remarks	NRC/Industry
NEI Presentation: SRO – LSRO Licensing	Industry
Open Discussion	NRC/Industry
Public Comments	Public
Closing Remarks	NRC/Industry

## **DISCUSSION SUMMARY**

### **Introduction**

This public meeting between NRC staff and representatives of the industry was to discuss the OL program administered by the NRC staff. Specifically, the NRC staff and industry representatives discussed the licensing of senior reactor operators (SROs) at one facility as SROs limited to fuel handling (LSROs) at another, and miscellaneous topics.

No regulatory decisions were made during the meeting.

### **Discussion**

The industry representatives discussed the draft submission of the white paper available in ADAMS at ML25203A241, which aims to leverage Senior Reactor Operators (SROs) for fuel handling tasks at other facilities, highlighting the efficiency and proficiency benefits of this approach. It was noted that historically, there was limited technology available that could support direct oversight of fuel handling by on shift SROs. However, with advancements in technology, SROs may be able to provide direct oversight of fuel handling from other areas, including control rooms, potentially pointing to future allowances or changes to current regulations. Despite this, industry representatives emphasized that the current regulations are being addressed as written in the draft white paper. The draft white paper includes a table of relevant regulations and an analysis of the differences between SRO and Limited Senior Reactor Operator (LSRO) roles. It presents two recommendations: preferably maintaining one license per individual, or alternatively, issuing individual licenses, though this may be more challenging to manage. Additionally, there is a TBD section in Attachment 1 that will be developed to streamline the LSRO application process following dispositioning of questions and comments in guidance development.

Regarding proficiency and training, full SROs are expected to maintain proficiency through their daily activities, with the Systematic Approach to Training (SAT) process being utilized to meet training requirements. Ensuring proficiency and training involves combining medical requirements, crediting SRO proficiency, and requalification programs to meet Code of Federal Regulations requirements.

The industry representatives added practical insights from their past experiences, including moving fuel 2-3 times at Calvert Cliffs as an SRO, suggesting that Just-In-Time Training could address equipment differences. Another industry representative also shared his experience in fuel movement as an SRO, indicating that the material differences between facilities can be adequately covered.

The NRC staff explained that the purpose of the license is twofold: it confers both authority and accountability for actions. A key point of consideration in the issuance of licenses is to which facility the license is applicable. Facility licensees, the entity holding the license, is responsible for compliance with a license. For example, while the Palo Verde facility licensee holds its licenses for three units at that station, the discussion now involves multiple facilities with multiple facility licensees, which differs from the current structure. The NRC staff emphasized that SRO and LSRO licenses are treated as separate and distinct, similar to RO and SRO licenses, and possibly cannot be issued on the same license. An LSRO license can cover multiple facilities at

the same license level; therefore, multiple facilities have historically been issued on one, because the license level at each facility was the same. Combining an SRO and LSRO onto the same license would complicate this process. The NRC staff also stated that the regulations require that the licensee be employed by the facility licensee, with contractors considered to be employed to meet this requirement. The facility licensee retains ultimate responsibility for compliance, such as when contracting work to vendors. To apply the concept to the LSRO discussion, as an example, North Anna Power Station (NAPS) cannot transfer its responsibilities to Surry Power Station but can establish contracts delineating responsibilities, such as maintaining medical requirements.

The NRC staff highlighted that requalification programs must be in place, with 55.59(c)(6) allowing for alternate training programs if they are similar and commission approved. For example, Surry's training program, accredited by INPO, applies only to Surry, not NAPS. However, a contract or legal agreement could document an approved program covering the necessary deltas for a NAPS LSRO. Detailed responsibilities and controls need to be outlined in the white paper. The industry representatives suggested fleet governance to control program changes, ensuring LSRO license requirements remain intact. The NRC staff added that alternate training could be referenced in applications, ensuring compliance with regulations and avoiding duplication, such as multiple medical examinations for SRO/LSROs. However, both facilities would be responsible for ensuring medical fitness and being able to produce those records for audits.

The industry representatives inquired about the functional differences between license types and the regulations driving them. The NRC staff clarified that while there is one system, different licenses are issued at various levels, requiring further review of how the proposal might work in the current framework. The industry representatives noted that the white paper's table could outline how a fleet could leverage past LSRO programs to find a regulatory pathway. Agreements across companies must clearly establish responsibilities. The NRC staff cautioned that if all licenses were on one, the expiration of an SRO at one facility could expire the entire license, recommending further review would be necessary to better understand this concern. The industry representatives acknowledged the need for future workshops and considerations, including understanding how potential exemptions would need to be utilized in this process. They emphasized the advantage of leveraging SRO work for LSRO licensing and navigating administrative processes. The NRC staff believed compliance could be achieved, possibly even without exemptions.

The NRC staff inquired about the submission status of the white paper and the next steps. The industry representatives responded that they are still exploring options and discussing the matter, with no request for endorsement at this stage and stated that it is too early to determine the next steps. The NRC staff suggested that the white paper could theoretically be developed and considered, noting that applicants could reference it if it were endorsed. The industry representatives asked if there were any additions needed for the table, and the NRC staff mentioned the need to consider establishing 10 CFR 50.54(x), though it is a slim possibility that the need to exercise 50.54(x) would be necessary as an LSRO. The industry representatives acknowledged this and mentioned the potential to learn from the Advance Act and Executive Orders, Part 53 work, which might be beneficial for Part 55 and advanced reactors.

The NRC staff raised concerns about the facility-specific nature of sample plans and operating test requirements, particularly for LSRO licenses requiring non-fuel handling JPMs at the facility.

There is a concern for an SRO at one facility being asked to obtain an LSRO license at a completely different facility, unfamiliar with the complete design. The industry representatives agreed that more training and evaluation might be required, emphasizing that the SRO licensed under Part 55 should have sufficient training through the SAT process to address differences. Personnel would not move fuel at a different site without necessary training, which would be identified through the SAT process. The scope of training would vary depending on facility similarities, but the goal would be to not recreate a full LSRO program in order to obtain a license.

The NRC staff appreciated the insights and emphasized the need for clear definitions of comparable facilities when discussing waivers. The industry representatives thanked the NRC staff for the challenge, highlighting the importance of understanding the scope of the proposal. The NRC staff discussed the need to consider the validity of medical exams across states, noting that physicians are state-licensed, and this process needs vetting. It was suggested to leverage practices from other industries, like truck drivers crossing state lines or the airline industry.

The industry representatives raised several open discussion items, including recognizing the NRC staff's workload with Advance Act, Section 507 and questions about proficiency requirements for writing exams. The NRC staff clarified that the NRC staff might still write exams to qualify as examiners. The industry representatives asked if there was any consideration for removing this requirement, and the NRC staff mentioned it is being considered but no action has been taken yet, and noted the interaction and experience gained while working with the licensee during exam development is valuable. The industry representatives encouraged the NRC to consider alternative methods, that may be more efficient and cost-effective, to provide examiners with the necessary knowledge, skills and interactions without the need to write an exam for the facility.

The industry representatives also discussed Part 50/52 alignment rulemaking and the potential use of glass panel simulators in the OL process. The NRC staff confirmed it is still in process, adding that internal research is ongoing to understand the gains and losses of using glass panel simulators. The industry representatives inquired about the timeline; the NRC staff mentioned it is actively ongoing. The industry representatives suggested discussing this in the fall, possibly in November, at the next OL public meeting. The NRC staff mentioned that representatives from the Office of Research might be available to present on the subject.

The industry representatives highlighted the industry's investment in glass panel simulators and the benefits for the licensing process. The NRC staff mentioned that research data collection for the glass panel project is scheduled for mid-August, involving former operators and OL examiners. The industry asked if the research would take into account stations that intend to supplement the analog plant reference simulator and in plant training and evaluation with a glass panel simulator to determine if the combination adequately addresses the challenges of using glass panel simulators alone. The NRC staff confirmed that they have a full-scope glass panel simulator and will create a digital twin for legacy simulators, conducting JPMs and scenarios on both to identify differences and challenges.

The industry representatives mentioned Executive Order 14300 and the NEI's agenda for efficiency opportunities, including Part 55. They plan to submit a report with recommendations addressing areas they believe are duplicative and proposing public discussions if they would be

beneficial. They emphasized industry's growth and the need to identify and address barriers to increasing process efficiency, and thanked the NRC staff for their extensive work being done across multiple areas during this time.

### **Public Comments**

There were no public comments.