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Draft NUREG: Training Review Criteria and Procedures

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Comment on FR Doc # 2026-17132, NRC-2026-1849-0006, from Jose Martin Laguna

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General Comment

Please see the attached PDF for my detailed comments on Draft NUREG-1220, Revision 2, "Training Review Criteria and Procedures." I submit these comments solely in my personal capacity as an individual member of the public. The attached comments address: (1) alignment of licensed operator examination content with SAT learning objectives; (2) clarification of expectations for Context/Environment Analysis and Learner Analysis; and (3) clarification of Cognitive Job Analysis and training for supervision of automated functions. Supporting references are included in the attachment. Thank you for the opportunity to comment.

Attachments

Draft NUREG-1220 Revision 2 Comments - Jose M Martin Laguna

Jose M. Martin Laguna
Charlotte, NC

September 17, 2026

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTN: Guidance and Publications Branch

Subject: Comments on Draft NUREG-1220, Revision 2, “Training Review Criteria and Procedures” — Docket ID NRC-2026-1849

Dear Guidance and Publications Branch Staff:

Please accept this letter as my public comment on Draft NUREG-1220, Revision 2, “Training Review Criteria and Procedures,” Docket ID NRC-2026-1849.

I submit these comments solely in my personal capacity as an individual member of the public. They are my own views and are not submitted on behalf of, and should not be attributed to, my employer or any other organization.

I respectfully submit three comments concerning the relationship between licensed operator examinations and SAT learning objectives, expectations for context/environment and learner analyses, and the treatment of cognitive and supervisory tasks associated with increased automation.

Thank you for the opportunity to comment on Draft NUREG-1220, Revision 2.

Respectfully submitted,

Jose M. Martin Laguna
Nuclear Professional
Individual member of the public
Charlotte, NC

Comment #1. Alignment of Licensed Operator Examination Content with SAT Learning Objectives

Relevant sections: Sections 3.2.2, 3.2.3, and 3.3.3; Appendix L; interface with 10 CFR Part 55, NUREG-1021, and DRO-ISG-2023-01.

Background and analysis:

Draft NUREG-1220 describes a logical SAT chain in which job and task analysis identifies the knowledge, skills, and abilities (KSAs) necessary for job performance; learning objectives are derived from that analysis; training is developed from those objectives; and evaluation items determine whether the objectives have been mastered.

For licensed operators, however, the initial licensing examination process generally introduces a separate K/A structure through NUREG-1021 and the generic K/A catalogs. A facility may therefore systematically identify plant-specific tasks and KSAs, derive measurable terminal learning objectives, and then map examination content back to a separate generic K/A taxonomy.

There is a longstanding regulatory history supporting a closer relationship between SAT learning objectives and licensing examinations.

The 1987 revision to 10 CFR Part 55 established in §§ 55.41(a), 55.43(a), and 55.45(a) that examination KSAs would be identified, **in part, from learning objectives derived from a systematic analysis of licensed operator and senior operator duties.**

NUREG-1262, issued later in 1987 to explain implementation of the revised rule, further described the intended relationship between facility learning objectives and NRC examinations. In Question 123, p. 31, the NRC stated: *“We intend to evolve over time to the point where we can construct an NRC exam solely using the facility learning objectives.”* In Question 124, p. 31, the NRC further stated that its intent was *“to reach the point where the training program’s learning objectives become the major source for our examination.”* The continued use of additional examination sources was necessary in part because facility learning objectives at that time varied in completeness and quality.

The issue was revisited in SECY-98-266. NEI and an industry commenter proposed allowing facility-specific task lists to replace the generic NUREG-1122 and NUREG-1123 catalogs for establishing examination content validity. NRC declined that proposal, citing concerns including examination consistency, sampling bias, and additional NRC review effort. Importantly, however, the staff simultaneously reaffirmed that NUREG-1262 had established the intent for training-program learning objectives to become the major source of the licensing examination. The 1998 decision therefore rejected wholesale substitution of site-specific task lists under the examination methodology then in place; it did not reject the underlying relationship between systematically derived learning objectives and licensing examination content.

More recently, Draft DRO-ISG-2023-01, “Operator Licensing Programs,” provides guidance for tailored operator licensing programs for Part 53 facilities. NRC’s associated SAT/examination alignment material shows a design- or site-specific KSA list developing from the SAT job and task analysis and serving as the basis for examination sampling. The material also recognizes that training-program learning objectives and associated examination items may support the operator examination process when appropriately tied to the approved KSA list.

This recent approach is significant because it demonstrates that a generic reactor-type K/A catalog is not necessarily the only mechanism capable of providing examination content validity. A rigorous design- or facility-specific SAT analysis, combined with NRC review, importance ranking, regulatory traceability, and systematic sampling, could provide the required examination basis.

Given the maturity of SAT programs and modern configuration-control and traceability capabilities, the NRC should consider whether a complete set of terminal learning objectives could ultimately serve as the primary examination sampling population when those objectives are demonstrably traceable to approved tasks, KSAs, safety significance, and applicable Part 55 requirements.

This would provide a more direct SAT traceability chain: job duties and tasks → KSAs → terminal learning objectives → training → licensing examination.

The KSA analysis would remain essential. NRC would also retain its independent authority to determine examination scope and to evaluate material outside facility learning objectives when the underlying analysis or objectives are incomplete or when other safety-significant information warrants examination.

Recommendation:

Consider clarifying the intended relationship between SAT learning objectives and licensed operator examination content and evaluating whether, when a facility maintains a complete, configuration-controlled set of terminal learning objectives with demonstrated traceability to applicable tasks, KSAs, safety significance, and 10 CFR 55.41, 55.43, and 55.45, those objectives may serve as the primary population from which site-specific examination content is systematically sampled.

NUREG-1021 could continue to govern examination construction, systematic sampling, examination quality, security, administration, grading, and NRC oversight. Generic K/A catalogs could continue to provide benchmarking, completeness checks, and generic content where appropriate.

If such a change is beyond the scope of NUREG-1220 Revision 2, the NRC should consider identifying the issue for future coordination among NUREG-1220, NUREG-1021, and the approaches established in DRO-ISG-2023-01.

Comment #2. Clarification of Expectations for Context/Environment Analysis and Learner Analysis

Relevant sections: Sections 3.1.6 and 3.1.7; Appendix A; Appendix D.

Background and analysis:

Draft NUREG-1220 identifies Context/Environment Analysis and Learner Analysis as individual elements within the Analysis phase of SAT and establishes criteria for reviewing them.

The concepts addressed by these analyses are appropriate and are routinely considered when developing and maintaining training programs. Training organizations necessarily consider trainee prerequisites and experience, available facilities and instructional technologies, resources, schedules, and the environment in which training will occur.

The potential ambiguity is whether Revision 2 intends these activities to constitute new, formal, independently documented SAT subprocesses.

Existing training programs may address these considerations within other SAT processes rather than through separately titled "Context/Environment Analysis" or "Learner Analysis" documents. Learner characteristics, for example, may be reflected in entry requirements, exemption processes, task analysis, curriculum design, or training program descriptions. Environmental considerations may be reflected in training-setting decisions, lesson plans, simulator requirements, facilities, or implementation procedures.

The draft itself recognizes that context/environment analysis may be incorporated into other analysis processes and that learner-analysis documentation may be relatively simple. Nevertheless, separately identifying and evaluating these activities could be interpreted as establishing an expectation for formal processes and documentation that may not presently exist.

If a formal documented analysis is expected, additional guidance would be useful concerning its scope, required inputs and outputs, level of documentation, periodicity, and acceptance criteria.

Recommendation:

Clarify whether Context/Environment Analysis and Learner Analysis are expected to be standalone formal SAT subprocesses or whether the intent is to verify that the underlying considerations have been adequately addressed within the licensee's existing SAT processes.

If separate formal analyses are expected, provide guidance describing the expected scope, documentation, acceptance criteria, and examples of acceptable implementation.

Comment #3. Clarification of Cognitive Job Analysis and Training for Supervision of Automated Functions

Relevant section: Section 3.1.3, “Cognitive Job Analysis,” and related Job/Task Analysis guidance.

Background and analysis:

The discussion of cognitive job analysis in Draft NUREG-1220 is an important addition. The draft appropriately recognizes that increasing automation can shift work from readily observable physical actions toward supervisory control and that personnel may be required to monitor automated systems even when little routine manual interaction occurs.

This change creates a SAT implementation issue that would benefit from additional clarification.

Traditional task-analysis methods work particularly well for discrete actions with observable starting conditions, steps, and completion criteria. Automation can shift the human role toward monitoring, interpretation, verification, decision-making, and intervention. These activities may involve significant cognitive requirements despite relatively little physical action.

For example, personnel may need to determine whether an automated function is behaving correctly, recognize when intervention is required, understand operating modes and limitations, diagnose degraded or unexpected behavior, transition to manual control, or supervise multiple automated functions simultaneously.

Simply identifying a task such as “monitor operation of the ___ system” may therefore not capture the full set of KSAs necessary for successful performance.

The important principle is that automation does not necessarily eliminate a training requirement. It may instead change the required competence from physical execution of a task to effective supervision, interpretation, verification, and intervention.

Recommendation:

Expand or clarify the Cognitive Job Analysis guidance to describe how licensees and NRC reviewers should identify and evaluate supervisory and cognitive tasks associated with automated functions.

The guidance should clarify that job and task analysis should capture not only observable manual actions but also the cognitive requirements necessary to monitor, interpret, verify, supervise, and, when required, intervene in automated processes.

Consider including an example showing how an automated function is traced through SAT from the supervisory or monitoring task, through associated KSAs, to learning objectives and evaluation items.

References

1. 10 CFR Part 55, §§ 55.41, 55.43, and 55.45.
2. NRC, NUREG-1262, *Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses*, 1987.
3. NRC, SECY-98-266, Final Rule -- Requirements for Initial Operator Licensing Examinations, November 13, 1998.
4. NRC, NUREG-1021, *Operator Licensing Examination Standards for Power Reactors*.
5. NRC, Draft DRO-ISG-2023-01, *Operator Licensing Programs*.
6. NRC, Draft NUREG-1220, Revision 2, *Training Review Criteria and Procedures*.