TEXAS A&M ENGINEERING
EXPERIMENT STATION

NUCLEAR SCIENCE CENTER

February 11, 2014 2014-0012

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Response to USNRC Requests for Additional Information RAI 1-6, Operator Requalification Program, from the Texas A&M University System, Texas Engineering Experiment Station, Nuclear Science Center Reactor (NSCR, License No. R-83, Docket 50-128)

To Whom It May Concern:

The Texas A&M University System, Texas Engineering Experiment Station (TEES), Nuclear Science Center (NSC, License No. R-83) operates a LEU, 1MW, TRIGA reactor under timely renewal. In December, 2003 the NSC submitted a Safety Analysis Report (SAR) as part of the license renewal process. In December, 2005 a conversion SAR (Chapter 18) was submitted resulting in an order to convert from the USNRC. In July 2009, the NSC submitted an updated SAR, dated June 2009, to the USNRC. This updated 2009 version of our SAR incorporated the information from the conversion SAR and the startup of the new LEU reactor core. On January 8, 2014 the USNRC submitted a Request for Additional Information re: Operator Requalification Program as a part of the review process. Attached is our reply to these six questions and our proposed revision to the Operator Requalification Program that incorporates our reply.

If you have any questions, please contact Jerry Newhouse at 979-845-7551.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 11, 2014.

Jerry Newhouse
NSC, Assistant Director

Xc: 2.11/Central File
Duane Hardesty, USNRC Project Manager

M003
A020
NRR

TEL. 979.845.7551 | FAX 979.862.2667
nsc.tamu.edu
1095 Nuclear Science Rd. | 3575 TAMU | College Station, TX 77843-3575

Texas A&M University System
Texas Engineering Experiment Station
Nuclear Science Center
License No. R-83
Docket No. 50-128

Responses to Request for Additional Information
Requalification Plan

The U.S. Nuclear Regulatory Commission (NRC) is continuing its review of your application for the renewal of Facility Operating License No. R-83, dated February 27, 2003 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML102920025), as supplemented, for the Texas Engineering Experiment Station/Texas A&M University System, Nuclear Science Center, TRIGA-type research reactor. Your license renewal application letter indicated that there were no changes needed to your current Senior Reactor operator and Reactor Operation Requalification Program, Revision No. 4, dated April 16, 1997. However, the NRC staff review of your license renewal application includes a review of your Operation Requalification Program, from which we identified some questions, which are provided in the enclosed request for additional information (RAI). Please provide your responses to the enclosed RAI within 30 days from the date of this letter.

1. *Title 10 of the Code of Federal Regulations (10 CFR) 55.59(a)(2) states:*
   (a) Requalification requirements. Each licensee shall- (2) Pass a comprehensive requalification written examination and an annual operating test.

   Section 2.2, "Licensee Evaluation," of your requalification program makes no mention of a comprehensive requalification written examination being administered at any point during the 24-month requalification program. Please propose changes to the plan to ensure that this requirement is met.

NSC Response:

The Requalification Plan has been revised to incorporate the requirement of 10 CFR 55.59(a)(2). As part of the overall updates to NSC Tech Specs required during the relicensing review, we updated TS 6.1.4.4 "Requalification Program" to reference ANSI/ANS-15.4-2007. Using this standard, specifically parts 6.2 "Requalification Program" and 6.2.2 "Written Examination," we conducted a trial comprehensive requalification written exam in 2013. This exam will of course be updated for the next requalification cycle. We believe these changes will ensure we meet the requirement of 10 CFR 55.59(a)(2).

Texas A&M University System
Texas Engineering Experiment Station
Nuclear Science Center
License No. R-83
Docket No. 50-128

Responses to Request for Additional Information
Requalification Plan

The U.S. Nuclear Regulatory Commission (NRC) is continuing its review of your application for the renewal of Facility Operating License No. R-83, dated February 27, 2003 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML102920025), as supplemented, for the Texas Engineering Experiment Station/Texas A&M University System, Nuclear Science Center, TRIGA-type research reactor. Your license renewal application letter indicated that there were no changes needed to your current Senior Reactor operator and Reactor Operation Requalification Program, Revision No. 4, dated April 16, 1997. However, the NRC staff review of your license renewal application includes a review of your Operation Requalification Program, from which we identified some questions, which are provided in the enclosed request for additional information (RAI). Please provide your responses to the enclosed RAI within 30 days from the date of this letter.

2. *10 CFR 55.53(e) states:*

> *If a licensee has not been actively performing the functions of an operator or senior operator, the licensee may not resume activities authorized by a license issued under this part except as permitted by paragraph (f) of this section. To maintain active status, the licensee shall actively perform the functions of an operator or senior operator on a minimum of seven 8-hour or five 12-hour shifts per calendar quarter. For test and research reactors, the licensee shall actively perform the functions of an operator or senior operator for a minimum of four hours per calendar quarter.*

Section 3.0, "Control Room Proficiency," of your requalification program makes no mention of the minimum of four hours per calendar quarter that the regulation requires for operators to maintain active status. Please propose changes to the plan to ensure that this requirement is met.

NSC Response:

The Requalification Plan has been revised to incorporate the license functional performance requirement of 10 CFR 55.53(e). It should be noted that although this requirement was not identified in Section 3.0 of Revision 4 of our plan, it was referenced in Section 4.0 "Operator Reinstatement" and is explicitly described by NSC Standard Operating Procedure (SOP) X-A-2.b.1 (which was outside of the materials provided for your review). The NSC has met the requirement of 10 CFR 55.53(e) in practice for many years.

Texas A&M University System
Texas Engineering Experiment Station
Nuclear Science Center
License No. R-83
Docket No. 50-128

Responses to Request for Additional Information
Requalification Plan

The U.S. Nuclear Regulatory Commission (NRC) is continuing its review of your application for the renewal of Facility Operating License No. R-83, dated February 27, 2003 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML102920025), as supplemented, for the Texas Engineering Experiment Station/Texas A&M University System, Nuclear Science Center, TRIGA-type research reactor. Your license renewal application letter indicated that there were no changes needed to your current Senior Reactor operator and Reactor Operation Requalification Program, Revision No. 4, dated April 16, 1997. However, the NRC staff review of your license renewal application includes a review of your Operation Requalification Program, from which we identified some questions, which are provided in the enclosed request for additional information (RAI). Please provide your responses to the enclosed RAI within 30 days from the date of this letter.

3. *10 CFR 55.53(e) states:*

> *If a licensee has not been actively performing the functions of an operator or senior operator, the licensee may not resume activities authorized by a license issued under this part except as permitted by paragraph (f) of this section. To maintain active status, the licensee shall actively perform the functions of an operator or senior operator on a minimum of seven 8-hour or five 12-hour shifts per calendar quarter. For test and research reactors, the licensee shall actively perform the functions of an operator or senior operator for a minimum of four hours per calendar quarter.*

The first sentence of Section 3.1, "Console Manipulations," of your requalification program states:

> *At intervals not to exceed four months, each licensee shall execute his licensed responsibilities.*

The statement "intervals not to exceed four months" does not appear to be consistent with the regulations. Pursuant to 10 CFR 55.53(e), the licensee shall actively perform the functions of an operator or senior reactor operator for a minimum of four hours per calendar quarter. The term "calendar quarter" is defined as every three months. Please propose changes to the plan to ensure that this requirement is met.

NSC Response:

The Requalification Plan has been revised to incorporate the calendar quarter periodicity requirement of 10 CFR 55.53(e). It should be noted that although this periodicity was defined as "not to exceed four months" in Section 3.1 of Revision 4 of our plan, NSC SOP X-A-2.b.1 (which was outside of the materials provided for your review) uses the correct three month definition. The NSC has met the requirement of 10 CFR 55.53(e) in practice for many years.

Texas A&M University System
Texas Engineering Experiment Station
Nuclear Science Center
License No. R-83
Docket No. 50-128

Responses to Request for Additional Information
Requalification Plan

The U.S. Nuclear Regulatory Commission (NRC) is continuing its review of your application for the renewal of Facility Operating License No. R-83, dated February 27, 2003 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML102920025), as supplemented, for the Texas Engineering Experiment Station/Texas A&M University System, Nuclear Science Center, TRIGA-type research reactor. Your license renewal application letter indicated that there were no changes needed to your current Senior Reactor operator and Reactor Operation Requalification Program, Revision No. 4, dated April 16, 1997. However, the NRC staff review of your license renewal application includes a review of your Operation Requalification Program, from which we identified some questions, which are provided in the enclosed request for additional information (RAI). Please provide your responses to the enclosed RAI within 30 days from the date of this letter.

4. *10 CFR 55.59(a)(2)(ii) states:*

> *The operating test will require the operator or senior operator to demonstrate an understanding of and the ability to perform the actions necessary to accomplish a comprehensive sample of items specified in §55.45(a)(2) through (13) inclusive to the extent applicable to the facility.*

Section 3.2, "Licensee Evaluation," of your requalification program makes no mention of how the licensee will evaluate the operator's ability to perform actions specified in 10 CFR 55.59 [believe this should read 55.45] *(a)(2) through (13). Please propose changes to the plan to ensure that this requirement is met.*

NSC Response:

The Requalification Plan has been revised to describe how we will evaluate the operator's ability to perform actions specified in 10 CFR 55.45(a)(2) through (13).

Texas A&M University System
Texas Engineering Experiment Station
Nuclear Science Center
License No. R-83
Docket No. 50-128

Responses to Request for Additional Information
Requalification Plan

The U.S. Nuclear Regulatory Commission (NRC) is continuing its review of your application for the renewal of Facility Operating License No. R-83, dated February 27, 2003 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML102920025), as supplemented, for the Texas Engineering Experiment Station/Texas A&M University System, Nuclear Science Center, TRIGA-type research reactor. Your license renewal application letter indicated that there were no changes needed to your current Senior Reactor operator and Reactor Operation Requalification Program, Revision No. 4, dated April 16, 1997. However, the NRC staff review of your license renewal application includes a review of your Operation Requalification Program, from which we identified some questions, which are provided in the enclosed request for additional information (RAI). Please provide your responses to the enclosed RAI within 30 days from the date of this letter.

5. *10 CFR 55.59(f)(2) states:*

> *(f) If paragraph (e) of this section is not met, before resumption of functions authorized by a license issued under this part, an authorized representative of the facility shall certify the following:*
>
> *(2) That the licensee has completed a minimum of 40 hours of shift functions under the direction of an operator or senior operator as appropriate and in the position to which the individual will be assigned. The 40 hours must have included a complete tour of the plant and all required shift turnover procedures. For senior operators limited to fuel handling under paragraph (c) of this section, one shift must have been completed. For test and research reactors, a minimum of six hours must have been completed.*

Section 4.0, "Operator Reinstatement," of your requalification program makes no mention of the minimum of six hours that the regulation requires before resumption of functions authorized by a license. Please propose changes to the plan to ensure that this requirement is met.

NSC Response:

The Requalification Plan has been revised to incorporate the requirement of 10 CFR 55.59(f)(2). It should be noted that although this requirement was not stated in Section 4.0 of Revision 4 of our plan, NSC SOP X-A-2.b.3 (which was outside of the materials provided for

your review) incorporates the six hour requirement. The NSC has met the requirement of 10 CFR 55.59(f)(2) in practice for many years.

Texas A&M University System
Texas Engineering Experiment Station
Nuclear Science Center
License No. R-83
Docket No. 50-128

Responses to Request for Additional Information
Requalification Plan

The U.S. Nuclear Regulatory Commission (NRC) is continuing its review of your application for the renewal of Facility Operating License No. R-83, dated February 27, 2003 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML102920025), as supplemented, for the Texas Engineering Experiment Station/Texas A&M University System, Nuclear Science Center, TRIGA-type research reactor. Your license renewal application letter indicated that there were no changes needed to your current Senior Reactor operator and Reactor Operation Requalification Program, Revision No. 4, dated April 16, 1997. However, the NRC staff review of your license renewal application includes a review of your Operation Requalification Program, from which we identified some questions, which are provided in the enclosed request for additional information (RAI). Please provide your responses to the enclosed RAI within 30 days from the date of this letter.

6. *10 CFR 55.59(a)(2) states:*

> *(a) Requalification requirements. Each licensee shall-*
>
> *(2) Pass a comprehensive requalification written examination and an annual operating test.*

Section 6.0, "Exemption," of your requalification plan states:

> *The Director or his designee will be responsible for evaluating the written examinations. The individual preparing a particular examination is exempt from that examination. This must be the qualified individual who has presented lectures and prepared the questions for that examination. No exemption to the physical manipulation requirements will be granted to any licensee.*

In theory, the first sentence of the above paragraph could exempt one person indefinitely from the requirement to take a written examination. It is not clear if the Director or his designee is exempt from taking the written examinations. Please propose changes to the plan to ensure that no one individual is permanently exempted from meeting the requirements of 10 CFR 55.59; for example, through the addition of a requirement that exam preparation is rotated among senior reactor operators.

NSC Response:

Section 6.0 "Exemption" of Revision 4 was written with the idea that the comprehensive written exam would be split up into many smaller exams throughout the cycle in mind. An SRO who wrote one smaller exam would be exempted from it, while having to take all the other smaller exams, and being prohibited from preparing that same smaller exam during the next cycle. An exemption from taking the comprehensive exam is included in the new revision. This exemption incorporates the example solution provided in RAI 6, where the responsibility for preparing the exam will be rotated throughout the SRO pool, with the same SRO prohibited from preparing the exam two cycles consecutively.

Texas A&M Engineering Experiment Station
Nuclear Science Center

Senior Reactor Operator and Reactor Operator Requalification Program

Facility License R-83
Docket 50-128

Approved by NSC Director: _____ Date: 3/11/2014

CONTENTS

0.0 REFERENCE DOCUMENTS

0.1 10 CFR 55.41 Written examination: Operators
0.2 10 CFR 55.43 Written examination: Senior operators
0.3 10 CFR 55.45 Operating tests
0.4 10 CFR 55.53 Conditions of licenses
0.5 10 CFR 55.59 Requalification
0.6 ANSI/ANS-15.4-2007 Selection and Training of Personnel for Research Reactors

1.0 REQUALIFICATION PROGRAM

1.1 Purpose and Overview

As stated in ANSI/ANS-15.4-2007, the purpose of the requalification program is to "refresh in areas of infrequent operation, to review facility and procedural changes, to address subject matter not reinforced by direct use, and to improve in areas of performance weakness."

1.2 Applicability

Every person holding a valid reactor operator or valid senior reactor operator issued by the USNRC shall successfully complete the requalification program.

1.3 Periodicity

The Requalification Program shall be conducted for a continuous period not to exceed 24 months in duration. Upon completion it shall be promptly followed by successive requalification programs.

1.4 Composition

The Requalification Program shall be composed of regular and continuing preplanned lectures, on-the-job training, a comprehensive written examination, operating tests, and maintenance of active license status.

1.5 Responsibility

The NSC Director, or his designated alternate, is responsible for the requalification of the facility reactor operators and senior reactor operators.

1.5.1 Lectures shall be reviewed and presented by a knowledgeable person or group of people. The suitability of this person or group of people shall be determined by the NSC Director or his designated alternate.

1.5.2 On-the-job training shall be verified by licensee's normal supervisor of those activities.

1.5.3 Comprehensive written examinations shall be prepared and graded by a rotation within licensed SROs. At no time shall the same SRO be responsible for two consecutive written examinations unless there is only one licensed SRO.

1.5.4 The NSC Director or his designated alternate shall be responsible for verifying the maintenance of active license statuses.

2.0 LECTURES

2.1 Overview

Lectures are intended to confirm knowledge of facility changes that have occurred since the previous lecture, to provide refresher training in critical areas such as emergency planning, response to abnormal conditions, radiation protection, and reactor operation, and to allow operators with the opportunity to re-enforce knowledge areas in which they have questions.

2.2 Applicability and Performance

Reactor operators and senior reactor operators shall attend all lectures. Missed lectures may be made up by one-on-one training or self-study.

2.3 Periodicity

One or more lectures will be scheduled within a three month interval to cover topics selected from the list below. There are only seven topics in the list. The eighth quarter of the requalification program should be used to revisit any topics in the list in which operators could use additional instruction.

2.4 Lecture Topics

2.4.1 Theory and Principles of Operation

2.4.2 Regulations
- 2.4.2.1 Applicable portions of 10CFR
- 2.4.2.2 Technical Specifications
- 2.4.2.3 Standard Operating Procedures
- 2.4.2.4 Experiment and Modification Authorizations

2.4.3 Reactor Design
- 2.4.3.1 Facility Operating Characteristics
- 2.4.3.2 Instrumentation and Control Systems
- 2.4.3.3 Facility Protection and Engineered Safety Systems

2.4.4 Reactor Support Systems

2.4.5 Radiation Control and Safety

2.4.6 Emergency Plan

2.4.7 Security Plan

3.0 ON-THE-JOB TRAINING

3.1 Overview

On-the-job training ensures that every licensed operator actually performs, with some regularity, the functions they are expected to be proficient at and may be called on to perform at any time.

3.2 Applicability

Reactor operators shall perform all of the required manipulations. Senior reactor operators may receive credit for directing required manipulations as they are performed.

3.3 Performance

Many required manipulations may be easily covered in day-to-day work. Some will require special events such as planned reactor time, drills, and simulated operations. An example of a simulated operation is physically identifying which breakers to open during a loss of electrical power, but not actually opening them as doing so would negatively affect normal operation and place unnecessary strain on equipment.

3.4 Periodicity

Items 3.5.1 through 3.5.6 shall be performed annually. Items 3.5.7 through 3.5.12 shall be performed biennially.

3.5 Manipulations

Annual:

- 3.5.1 Reactor startup to a power where reactivity feedback from nuclear heat addition is noticeable.
- 3.5.2 Reactor shutdown.
- 3.5.3 A steady state to steady state power change of greater than or equal to 10%.
- 3.5.4 Loss of coolant, both isolable and unisolable.
- 3.5.5 Loss of electrical power.
- 3.5.6 Loss of water supply.

Biennial:

- 3.5.7 Response to a rod drop.
- 3.5.8 Inability to drive control rods.
- 3.5.9 Fuel cladding failure or high activity in reactor coolant.
- 3.5.10 Servo control malfunction.
- 3.5.11 Response to a non-manual reactor scram.
- 3.5.12 Response to reactor instrumentation failure.

4.0 COMPREHENSIVE WRITTEN EXAMINATION

4.1 Overview

The written examination will contain a representative selection of questions on the knowledge, skills, and abilities needed to perform licensed duties.

4.2 Applicability and Periodicity

Each licensed operator shall take one comprehensive written examination during each 24 month requalification program.

4.3 Performance

The examination will be designed so that a score of 70 or better out of 100 total points will be considered a satisfactory performance. Any licensee who scores less than 70 will be removed from their licensed duties and enrolled in an accelerated retraining program until they demonstrate acceptable proficiency (70 out of 100). Any licensee with a score of greater than 70 but less than 80 will be tutored in problem areas to improve their performance level; they are not removed from licensed duties during this time of tutoring.

4.4 Reactor Operator Exam Contents

The comprehensive written examination for a reactor operator will include a representative sample from among the following items:

4.4.1 Fundamentals of reactor theory, including fission process, neutron multiplication, source effects, control rod effects, criticality indications, reactivity coefficients, and poison effects.

4.4.2 General design features of the core, including core structure, fuel elements, control rods, core instrumentation, and coolant flow.

4.4.3 Mechanical components and design features of the reactor primary system.

4.4.4 Secondary coolant and auxiliary systems that affect the facility.

4.4.5 Facility operating characteristics during steady state and transient conditions, including coolant chemistry, causes and effects of temperature, reactivity changes, operating limitations, and reasons for these operating characteristics.

4.4.6 Design, components, and functions of reactivity control mechanisms and instrumentation.

4.4.7 Design, components, and functions of control and safety systems, including instrumentation, signals, interlocks, failure modes, and automatic and manual features.

4.4.8 Components, capacity, and functions of emergency systems.

4.4.9 Shielding, isolation, and confinement design features, including access limitations.

4.4.10 Administrative, normal, abnormal, and emergency operating procedures for the facility.

4.4.11 Purpose and operation of radiation monitoring systems, including alarms and survey equipment.

4.4.12 Radiological safety principles and procedures.

4.4.13 Procedures and equipment available for handling and disposal of radioactive materials and effluents.

4.4.14 Principles of heat transfer thermodynamics and fluid mechanics.

4.5 Senior Reactor Operator Exam Contents

The comprehensive written examination for a senior reactor operator will include a representative sample from among the items required for a reactor operator and from among the following items:

4.5.1 Conditions and limitations in the facility license.

4.5.2 Facility operating limitations in the technical specifications and their bases.
4.5.3 Facility licensee procedures required to obtain authority for design and operating changes in the facility.
4.5.4 Radiation hazards that may arise during normal and abnormal situations, including maintenance activities and various contamination conditions.
4.5.5 Assessment of facility conditions and selection of appropriate procedures during normal, abnormal, and emergency situations.
4.5.6 Procedures and limitations involved in initial core loading, alternations in core configuration, control rod programming, and determination of various internal and external effects on core reactivity.
4.5.7 Fuel handling facilities and procedures.

5.0 OPERATING TEST

5.1 Overview

The operating test evaluates the licensee's mastery of operating the reactor and its support, safety, and emergency systems.

5.2 Applicability and Periodicity

Each licensed operator or senior shall take one operating test annually.

5.3 Performance

The examination will be designed such that each content area can be graded "unsatisfactory," "satisfactory," or "exceptional." Any licensee who receives an "unsatisfactory" rating in a content area will be removed from their licensed duties and enrolled in an accelerated retraining program until they demonstrate acceptable proficiency.

5.4 Contents

The operating test will require the licensee to demonstrate the understanding and ability to perform the actions necessary to accomplish a comprehensive sample of the following items:

5.4.1 Manipulate the console controls as required to operate the facility between shutdown and designated power levels.
5.4.2 Identify annunciators and condition-indicating signals and perform appropriate remedial actions where appropriate.
5.4.3 Identify the instrumentation systems and the significance of facility instrument readings.
5.4.4 Observe and safely control the operating behavior characteristics of the facility.
5.4.5 Perform control manipulations required to obtain desired operating results during normal, abnormal, and emergency situations.
5.4.6 Safely operate the facility's heat removal systems, and identify the relationship of the proper operation of these systems to the operation of the facility.

5.4.7 Safely operate the facility's auxiliary and emergency systems, including operation of those controls associated with plant equipment that could affect reactivity or the release of radioactive materials to the environment.

5.4.8 Demonstrate or describe the use and function of the facility's radiation monitoring systems, including fixed radiation monitors and alarms, portable survey instruments, and personnel monitoring equipment.

5.4.9 Demonstrate knowledge of significant radiation hazards, including permissible levels in excess of those authorized, and ability to perform other procedures to reduce excessive levels of radiation and to guard against personnel exposure.

5.4.10 Demonstrate knowledge of the emergency plan for the facility, including, as appropriate, the operator's or senior operator's responsibility to decide whether the plan should be executed and the duties under the plan assigned.

5.4.11 Demonstrate the knowledge and ability as appropriate to the assigned position to assume the responsibilities associated with the safe operation of the facility.

5.4.12 Demonstrate the licensee's ability to function within the control room team as appropriate to the assigned position, in such a way that facility licensee's procedures are adhered to and that the limitations in its license and amendments are not violated.

6.0 ACTIVE LICENSE STATUS

6.1 Overview

A minimum amount of job performance is required to maintain an active license. This minimum amount ensures continued familiarity with job functions throughout the licensed period.

6.2 Applicability, Periodicity, and Requirement

Each licensed operator shall perform the functions of an operator or senior operator, as appropriate, for a minimum of four hours per calendar quarter.

6.3 Reinstatement

If the requirement of 6.2 is not met, then to reinstate a licensed operator the NSC director or his designee shall certify the following:

6.3.1 The qualifications and status of the licensee are current and valid; and

6.3.2 A minimum of six hours of shift functions under the direction of an operator or senior operator as appropriate and in the position to which the individual will be assigned. The six hours must have included a complete tour of the plant and all required shift turnover procedures.

7.0 EXEMPTION FROM COMPREHENSIVE WRITTEN EXAM

The SRO who prepares and grades a requalification cycle's comprehensive written exam is exempt from taking the exam during that cycle. As stated in 1.5.3, the responsibility for exam preparation and grading will rotate within the SRO pool, unless there is only one licensed

SRO, so that one person is indefinitely exempt from the requirement to take a written examination.

8.0 RECORDS

The requalification program documentation must include the following:

8.1 The facility licensee shall maintain legible records documenting the participation of each licensed operator and senior operator in the requalification program.

8.2 The records must contain copies of written examinations administered, the answers given by the licensee, and the results of evaluations and documentation of operating tests and of any additional training administered in areas in which an operator or senior operator has exhibited deficiencies.

8.3 The facility licensee shall retain these records until the operator's or senior operator's license is renewed.