

March 30, 2016

MEMORANDUM TO: Michael Junge, Chief  
Human Performance, Operator Licensing  
and ITAAC Branch  
Division of Construction Inspection  
& Operational Programs  
Office of New Reactors

FROM: Jim Kellum */RA/*  
Human Performance, Operator Licensing  
and ITAAC Branch  
Division of Construction, Inspection  
& Operational Programs  
Office of New Reactors

SUBJECT: SUMMARY OF MARCH 2, 2016, PUBLIC MEETING WITH THE NUCLEAR  
ENERGY INSTITUTE OPERATOR LICENSING FOCUS GROUP FOR NEW  
REACTORS

On March 2, 2016, the U.S. Nuclear Regulatory Commission (NRC) staff held a category 2 public meeting with the NEI Operator Licensing Focus Group on New Reactor Operator Licensing at the NRC Headquarters in Rockville, MD. This meeting is typically held on a quarterly basis to discuss scheduling and ongoing issues and challenges to administering licensed operator examinations for new reactors. Enclosure 1 lists the attendees at the meeting. Enclosure 2 is the meeting agenda.

The staff provided an update on the status of Revision 11 to NUREG-1021, Operator Licensing Examinations Standards for Power Reactor. He stated that Rev. 11 was issued for public comment on February 11, 2016, with a 45 day public comment period but that two additional changes resulting from the NRC's Project AIM were made to the draft, that those changes will be published in the Federal Register, and that the public comment period would be extended until April 5, 2016. The targeted issue date for Revision 11 is the fall of 2016, then, per 10 CFR 55.40, the revision does become effective for six months. He also stated there is going to be a Regulatory Information Conference session discussing the revision on March 9, 2016.

Next, the meeting agenda offered an opportunity for the AP-1000 Owners Group (APOG) to provide an update from their monthly meeting and initiate discussion on topics from the APOG meeting. This segment of the meeting was prefaced by the NRC staff with the comment that there are several topics that are pre-decisional and as such the NRC staff would not be able to discuss information associated with those items. SCANA inquired about the approval status of the Vogtle Commission Approved Simulator (CAS) safety evaluation and exemptions being pursued by Vogtle for their operator licensing exam scheduled for April 2016. The staff stated that Vogtle's CAS request was under review and that he could not share any information on exemptions or the safety evaluation and stated that the NUREG-1021 process would have to be used. He also stated that, in lieu of a PRS, facility licensees would need to have a Commission-approved simulation facility pursuant to the requirements of 10 CFR 55.46, in order to commence administration of the initial licensed operator exam.

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SCANA stated that they were planning to submit a CAS facility request in March 2016, similar to the Vogtle submittal, and that SCANA was trying to understand the exemption process and what will be needed. SCANA followed up by asking if there was a path forward, with or without exemptions, that the staff would be at liberty to discuss and explained that SCANA, in general, had less familiarity with the exemption process, including the types and levels of approval within the NRC and associated timelines. SCANA also stated that they were trying to get a sense of the time frame for exam planning purposes. The staff provided a high-level overview of the exemption process described in Part 55, citing 10 CFR 55.11, "Specific exemptions," as the governing regulation and stated that the AP1000 operator licensing effort is a "first-of-a-kind" undertaking that has, and continues to evolve. It was emphasized that SCANA's path forward, relative to the exemption process, should be informed by interaction between the staff and SCANA Nuclear Licensing and stated that there are no defined timelines for exemptions, but that we were expecting to know something soon about the Vogtle exemptions. It was noted that simple exemptions, like the one written to allow Rev 10 of NUREG-1021, since it had been less than six months since issue, to be used for the AP1000 exam preparation for a potential May 2015 exam, took approximately three weeks. The Region II Operator Licensing Branch Chief affirmed that RII will be prepared to administer exams provided all the right pieces are in place and that he will not allow any exam to start unless everything is lined up, and also stated RII is working issues in parallel.

SCANA asked if there are time limits for which exemptions are valid. The staff stated exemptions can have sunset provisions and that each exemption is only applicable to the licensee to whom it was granted and may or may not be the same between licensees. SCANA also asked if exemptions would impact the 398s (Licensed Operator Application Form) for the first class of applicants at VC Summer and the staff responded that they would.

SCANA inquired about the continuing training program following an initial operator licensing exam and what the process would entail. The staff explained that the gap training and the continuing learning program concept, as originally envisioned, is not a plausible option because only one licensing exam is allowed to be administered for licensing purposes. Licensees will enter into a SAT-based licensed operator requalification program (LOR) and the RII operator licensing branch chief stated they would perform a 71111.11 inspection of the licensees SAT-based LOR Program prior to initial fuel load.

SCANA asked if IP 41502, "Nuclear Power Plant Simulation Facilities," inspection had to be completed prior to exam administration and was informed by the branch chiefs that IP 41502 does not have to be completed in its entirety prior to the exam. Performance testing satisfactorily conducted and inspected under the 41502 partial inspection conducted in the early 2015 is sufficient for exam administration.

SCANA asked if it would be possible to meet the requirements of a PRS prior to actual completion of the integrated system validation (ISV) process, by fixing and retesting the high priority HEDs and then performing ANSI 3.5 testing. The NRC staff explained that the testing described by SCANA did not fully meet the type of testing performed under the ISV process and provided an example of what the differences might look like. The staff also provided additional insight into the DAC process relative to the SCANA question. The staff stated that the ISV process had to be completed including successful performance of ANSI 3.5 testing, in order to meet the requirements of a PRS. The staff stated the ITAAC has to be completed through the ISV for the design to be complete. SCANA asked if it would be acceptable to declare the design complete and therefore have a PRS prior to issuance of the licensee's ITAAC closure letter(s), which can potentially add an additional 6 months to the process, if the discrepancies identified in the ISV report were sufficiently addressed and all of the appropriate testing satisfactorily performed (i.e., ISV and ANSI 3.5 testing). The staff replied that would require further discussion.

Southern raised the possibility of eliminating the STA position requirement at Vogtle Units 3 and 4, and inquired as to the best way for this to be accomplished. The staff replied that a license amendment request would need to be submitted for consideration to remove the STA requirement.

It was noted that Charles Sawyer, who had been the NEI/APOG point of contact for many years, was retiring in March, 2016 and his replacement would be Richard Grumbir.

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Enclosures: As stated

1. NRC/APOG AP-1000 OWNERS GROUP  
Meeting Attendees
2. Agenda

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See next page

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Richard Grumbir <Rich@rsconsultgrp.com>

NRC/APOG AP-1000 OWNERS GROUP ON  
NEW REACTOR OPERATOR LICENSING  
MARCH 2, 2016

<b>Name</b>	<b>Organization</b>
Gene Guthrie	NRC / R-II
Jim Kellum	NRC / NRO
Charles Sawyer	Duke Energy
Joe DeMarshall	NRC / NRO
Michael Junge	NRC / NRO
David Lavigne	SGE&G
Melinda Bogart	GEH
Frank Maciuska	Westinghouse
Terry McCool	FPL
Richard Browder	Duke Energy
Al Harris	SCE & G
John Austin	SNC
Paul Mothena	SCANA
Jason Weathersby	SCANA
Wes Sparkman	SNC
Greg Crosby	SNC
Andy Barbee	SCANA
Richard Grumbir	APOG
Mark Verbeck	SNC
April Rice	SCE & G
Paul Kallan	NRC / NRO
Steve Aiken	INPO
Tim Dennis	Member of Public
Guy Martin	Member of Public
Jana Bergman	Curtiss-Wright
Paul Pieringer	NRC / NRO
Lauren Kent	NRC / NRO
Scott Sloan	NRC / NRR
Rick Pelton	NRC / NRO
Christopher Whitfield	SNC
Scott Bauer	NEI
Leon Ray	SNC

AGENDA FOR THE CATEGORY 2 PUBLIC MEETING WITH THE  
NEI LICENSED OPERATOR FOCUS GROUP FOR NEW REACTORS

Wednesday, March 2, 2016

12:30 p.m. - 4:00 p.m.

U.S. Nuclear Regulatory Commission

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TOPIC

LEAD

Introductions and opening remarks

NRC

Public input

Public

- NUREG-1021 Rev. 11 Update
- Update/discussion from monthly APOG meetings
- Miscellaneous/Emergent topics

NRC

APOG

NRC/APOG

Public input

Public

Summary / Conclusion / Action item review

NRC