

Vogle PEmails

From: Hoellman, Jordan
Sent: Wednesday, April 06, 2016 11:48 AM
To: Vogle PEmails
Subject: Summary of Open Items on Operator Licensing
Attachments: 2016-04-07 SNC Summary of Open Items on Operator Licensing.docx

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Hearing Identifier: Vogtle_COL_Docs_Public
Email Number: 20

Mail Envelope Properties (036096b3393e4108a67428d4c208bb96)

Subject: Summary of Open Items on Operator Licensing
Sent Date: 4/6/2016 11:47:57 AM
Received Date: 4/6/2016 11:47:59 AM
From: Hoellman, Jordan

Created By: Jordan.Hoellman2@nrc.gov

Recipients:
"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>
Tracking Status: None

Post Office: HQPWMSMRS01.nrc.gov

Files	Size	Date & Time	
MESSAGE	229	4/6/2016 11:47:59 AM	
2016-04-07 SNC Summary of Open Items on Operator Licensing.docx			28381

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

Summary of Open Items on Operator Licensing Talking Points 4/7/2016 Public Meeting

SNC felt it would be helpful to review/summarize the applicable regulatory requirements and Current Licensing Basis (CLB) inputs supporting operator exams.

10 CFR 55.31(a)(4) states,

(a) The applicant shall:

(4) Provide evidence that the applicant has successfully completed the facility licensee's requirements to be licensed as an operator or senior operator and of the facility licensee's need for an operator or a senior operator to perform assigned duties. An authorized representative of the facility licensee shall certify this evidence on Form NRC-398. This certification must include details of the applicant's qualifications, and details on courses of instruction administered by the facility licensee, and describe the nature of the training received at the facility, and the startup and shutdown experience received. In lieu of these details, the Commission may accept certification that the applicant has successfully completed a Commission-approved training program that is based on a systems approach to training and that uses a simulation facility acceptable to the Commission under § 55.45(b) of this part;

VEGP 3&4 Updated Final Safety Analysis Report (UFSAR), Rev 4.2, Section 13.2A, "Cold License Training Plan"

Section 13.2A.1, "Licensed Operator Experience Requirements Prior To Commercial Operation:"

"Licensed operator candidates need not satisfy the experience requirements prior to entering a licensed operator training program. Experience and plant evolution requirements that have not been met at the time the licensed operator examination is administered shall be met prior to issuing the individual's NRC operator license. In such a case, the Licensee will notify the NRC when the candidate meets the experience and plant evolution requirements."

NUREG-1021, Revision 10, "Operator Licensing Examination Standards for Power Reactors"

Section ES-202.D.4, "Cold License Eligibility:"

"Cold licensed operator candidates need not satisfy the RG 1.8 or NANT 2010 experience requirements before entering a licensed operator training program. The experience requirements that have not been met at the time the licensed operator examination is administered will be certified by the licensee as being complete prior to the individual's NRC operator license being issued."

Section ES-204.C.2.b,

"The regional office may grant waivers identified in Section D.1 without first obtaining concurrence from the NRR/NRO operator licensing program office."

However, *waivers of experience requirements, completion of training, or completion of examinations not specifically identified in Section D.1 must be approved by NRR/NRO.*"

Section ES-204.D.1.a,

"The region may waive training requirements specified in the final safety analysis report (FSAR) when the FSAR authorizes waiver of those specific requirements . . ."

Section ES-204.D.1.f,

"For those applicants who are unable to meet the requirement for 6 weeks on shift at greater than 20 percent power . . . the NRC regional office may waive this requirement upon application if the following criteria are satisfied:

(1) Facility training objectives for the desired licensed position have been developed using a properly validated job task analysis . . .

(3) The facility licensee can accomplish the required training objectives for plant operation at greater than 20 percent power using . . . an NRC-approved simulation facility."

Section ES-204.D.1.i,

"The region may authorize a facility licensee to defer completion of the following specific experience and training guidelines until after the licensing examination is passed:

(1) up to 6 months of the 3 years . . .

(2) up to 2 months of . . .

(3) up to 1 month of . . .

The facility licensee must provide evidence that the deferred items have been completed before the region will issue the license (refer to ES-501)."

Section ES-501, "Initial Post-Examination Activities," Section C, "Responsibilities,"

Section 1, "Facility Licensee," Section a, states:

"If the NRC granted an applicant a deferral and allowed him or her to take the examination before completing all of the **training** and experience requirements, the regional office shall normally not issue a license to the applicant until the facility licensee has certified in writing that the applicant has completed all of the deferred items."

Cold License Process: CLB reflects cold/hot licenses. Has NRC moved to a single license position/process and, if so, when did this occur? Alternatively, does NRC plan to issue a cold license immediately following successful completion of all exams and training requirements?

ILT-1 Candidate History (provided to demonstrate the breadth and depth of training received by current exam candidates)

Since joining Vogtle 3&4, the typical ILT-1 candidate has participated in the following training:

- GFES Training (10 weeks initial for candidates not previously licensed and quarterly continuing training)
- AP1000 Certification (approximately 32 weeks)
- Mitigating Core Damage/Transient Accident Analysis (2 weeks)
- GFES Refresher (4 weeks)
- Systems Training (27 weeks)
- Procedures Training (17 weeks)
- Control Room Operations Training (21 weeks)

Open Items currently under consideration

1. 240 hours (6 weeks) for Control room observations-defined as training

BASIS: UFSAR 13.2A-201 Item 8; NUREG 1021, ES-202, -203, -204

NEI 06-13A states "...candidates without "hot" plant experience will complete a plant operational excellence course or they will observe control room activities at an operating nuclear plant for at least six weeks." INPO ACAD 10-001 states that the observation is to occur "integral with training." SNC believes portions of this requirement can be deferred via NRC Form 398 waiver.

DEFERRAL: A deferral is requested from the UFSAR and NEI 06-13A requirement to complete six weeks (240 hours) of observation activities at an operating nuclear plant until after the NRC Exam is administered. This requirement shall be certified complete prior to issuance of the individual NRC Operator License.

Why is the deferral needed?

Seven of eighteen candidates scheduled to take the May 2, 2016 NRC exam do not currently meet the requirement; five candidates have not completed the observation activities and two candidates performed the observation activities prior to systems training.

What is the consequence of granting the deferral?

There is no risk associated with this strategy as the utility does not need the licenses until fuel load, currently scheduled for Q4 2018. SNC will assign completion of the control room observation for the affected candidates immediately upon completion of the license exam and outstanding training items (significant control manipulations.) The control room observations are expected to be completed for all candidates no later than July 29, 2016. This completion date is consistent with discussion in NUREG 1021 ES-204, "the region may administer a license examination to an applicant who has not satisfied the applicable training or experience requirements at the time of the examination, but is expected to complete them shortly thereafter. Assuming that the applicant passes the examination, the regional office shall not issue the applicant's license until the facility licensee certifies that all of the requirements have been completed."

2. 1040 hours (6 months) of preoperational experience

BASIS: UFSAR 13.2A-201, Item 1; NUREG 1021, ES-202, -203, -204

SNC believes that portions of this requirement can be deferred via NRC Form 398 waiver.

DEFERRAL: A deferral is requested from the UFSAR and NEI 06-13A requirement to complete the following training program elements until after the NRC exam is administered. These training requirements shall be certified complete prior to issuance of the individual NRC Operator License:

- RO/SRO On-the-Job Training (OJT) Qualification Guide
- OJT program on selected Non-Licensed Operator (NLO) tasks

Why is the deferral needed?

The eighteen candidates scheduled to take the May 2, 2016 NRC exam do not meet the requirement, as they will not have completed these portions of the training program at the scheduled start of the exam.

What is the consequence of granting the deferral?

An OJT program using the methods provided in UFSAR 13.2A.3 is currently being implemented by SNC. All candidates in the current class will complete the associated qualification cards in June 2016.

This completion date is in keeping with the spirit of NUREG 1021 ES-204, “the region may administer a license examination to an applicant who has not satisfied the applicable training or experience requirements at the time of the examination, but is expected to complete them shortly thereafter. Assuming that the applicant passes the examination, the regional office shall not issue the applicant’s license until the facility licensee certifies that all of the requirements have been completed.”

Any qualification card items completed with the “discuss” method will be re-performed as plant construction supports to ensure the OJT program meets the quality obtainable by completing the associated activities on actual plant systems and components.

3. In Plant JPMs (exemption to use other methods) (Exemption letter covers this)
BASIS: UFSAR 13.2A.3; 10CFR55.45(a)(5). SNC believes that more effective training would result from deferral until sufficient plant components have been installed.

DEFERRAL: A deferral is requested from the UFSAR and NEI 06-13A requirement to complete 6 months (1040 hours) of practical work assignments until after the NRC Exam is administered. This requirement shall be certified complete prior to issuance of the individual NRC Operator License.

Why is the deferral needed?

The eighteen candidates scheduled to take the May 2, 2016 NRC exam do not meet this requirement, as they will not have completed the work assignments at the scheduled start of the exam.

What is the consequence of granting the deferral?

Minimal risk is associated with this strategy. Completion of the practical work assignments is underway, tracked, and will be resumed for the license candidates immediately upon completion of the license exam and training requirements. The utility does not need the candidates to have licenses issued until fuel load, and the requirement will be completed well before then. This strategy serves to ensure that the practical work assignments are meaningful (completion occurring on the current design

and future design changes) and provides for more involvement in preoperational testing, which the assignments have to include.

4. OJT/TPE waivers (to support May 2 exam date)

BASIS: UFSAR 13.2A.6

SNC believes that portions of this requirement can be deferred until shortly after exam completion via NRC Form 398 waiver.

DEFERRAL: A deferral is requested for the completion of the Reactor Startup certification and five required SIGNIFICANT CONTROL MANIPULATIONS. (NUREG ES-202, C.1.c) These manipulations will be completed within 30 days of completing the written and operating test on a Commission approved simulation facility.

Why is the deferral needed?

The eighteen candidates scheduled to take the May 2, 2016 NRC exam do not currently meet this requirement, as they will not have completed the required manipulations at the scheduled start of the exam.

What is the consequence of granting the deferral?

Completion of the manipulations will occur within 30 days of completing the written and operating test. This completion date is in keeping with the spirit of NUREG 1021 ES-204 "the region may administer a license examination to an applicant who has not satisfied the applicable training or experience requirements at the time of the examination, but is expected to complete them shortly thereafter. Assuming that the applicant passes the examination, the regional office shall not issue the applicant's license until the facility licensee certifies that all of the requirements have been completed."

5. Five significant control manipulations

BASIS: 10 CFR 55.31(a)(5)

SNC believes that the Commission Approved Simulator (CAS) Safety Evaluation Report allows control manipulations immediately following the exams.

NRC (R-II) agreed that this is a requirement to get a license, not a requirement to taking an exam. Therefore, SNC intends to complete control manipulations shortly after completion of NRC administered exams.