



OFFICE OF THE
SECRETARY

UNITED STATES
NUCLEAR REGULATORY COMMISSION
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November 25, 1991

RELEASED TO THE PDR	
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date	Initials

MEMORANDUM FOR: James M. Taylor
Executive Director for Operations

FROM: Samuel J. Chilk, Secretary *[Signature]*

SUBJECT: RECENTRALIZATION OF OPERATOR LICENSING
ACTIVITIES (COMFR-91-007)

It has been suggested by some that consistency in the development and administration of operator licensing exams is a significant problem, and may be partly a result of decentralization of the operator licensing function. Since the 1980s several studies have been performed on the NRC's Operator Licensing program and some of these have suggested that regional differences are not a major problem. The Commission believes that it should have more information on the sources of operator licensing inconsistencies to properly consider whether or not to change the structure of the program.

More specifically, the Commission has agreed that the staff should institute a study. The study should identify inconsistencies in the NRC's Operator Licensing Program, and their sources. The study should also identify and develop the pros and cons of recentralizing the operator licensing function taking into account the extent to which consistency in the development and administration of operator licensing exams is a significant problem, and may be partly related to decentralization of the operator licensing function. Here, the study should address the advantages and disadvantages of both a centralized and decentralized approach to operator licensing. When considering the concept of a centralized approach, the concept should be interpreted very broadly, and not necessarily limited to the idea of transferring all responsibility for administering operator licensing examinations to Headquarters. Recentralization of this responsibility could also be at the TTC in Chattanooga or one of the Regional offices. And relocating personnel could be phased in over time following recentralization of the function. Another alternative might be to maintain a central office with examiners "housed" in the Regions.

The Commission recommends that the study be conducted by a contracted organization which specializes in integrated management systems evaluations. The study should focus first on

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identifying the problems that exist, then on discussing in detail the extent to which these problems may relate to the decentralization of the operator licensing function.

The study should also consider the impacts of different organizational alternatives on career paths for examiners.

The evaluation of the pros and cons for recentralization should take into consideration all options for improvement within the present organizational structure, including: improved NRC guidance; more detailed guidance developed by industry; meetings between regional management; exchanges of regional personnel; greater Headquarters oversight; etc.

Finally, a recommendation on whether or not to change the present structure of the NRC's Operator Licensing Program should be presented.

(EDO)

(SECY Suspense: 120 days after
awarding contract)

cc: The Chairman
Commissioner Rogers
Commissioner Curtiss
Commissioner Remick
OGC
OIG