



OFFICE OF THE  
SECRETARY

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

IN RESPONSE, PLEASE  
REFER TO: M850912B

acs

September 25, 1985

MEMORANDUM FOR: William J. Dircks, Executive Director  
for Operations

Herzel H.E. Plaine, General Counsel

FROM: Samuel J. Chilk, Secretary *JS*

SUBJECT: STAFF REQUIREMENTS - AFFIRMATION/DISCUSSION  
AND VOTE, 3:30 P.M., THURSDAY, SEPTEMBER 12,  
1985, COMMISSIONERS' CONFERENCE ROOM, D.C.  
OFFICE (OPEN TO PUBLIC ATTENDANCE)

I. SECY-85-286 - "Exceptions" to Commission Order Establishing  
Information Hearing on Babcock and Wilcox Parks Township  
Facility

The Commission, by a 5-0 vote, approved an order which denies a July 30, 1985 request that the Commission amend its July 24, 1985 Order that had referred a hearing request on B&W's Parks Township Facility to the ASLBP for consideration in an informal hearing, and asked for a formal hearing instead.

(Subsequently, on September 19, 1985 the Secretary signed the order.)

II. SECY-85-287 - Review of ALAB-809

The Commission, by a 5-0 vote, approved an order that vacates ALAB-809 and the underlying Licensing Board decision as moot because the Licensing Board has subsequently completed its consideration of the Graterford emergency planning contentions.

(Subsequently, on September 19, 1985 the Secretary signed the order.)

III. SECY-85-150 - Final Policy Statement on Engineering  
Expertise on Shift

The Commission, by a vote of 4-1 (with Commissioner Roberts disagreeing), approved Version A of the Final Policy Statement on Engineering Expertise on Shift subject to the following:

8509300286 850925  
PDR 10CFR PDR  
PT9.7

1. Item b(1)(b) of Option 1 should be amended to read:  
"A Professional Engineer's (PE) license obtained by successful completion of the PE examination." (Chairman Palladino and Commissioners Bernthal and Asselstine agree.)
2. Item b(1)(c) of Option 1 should be deleted. (Chairman Palladino and Commissioners Bernthal and Zech agree.)
3. Item b(1)(f) of Option 1 should be deleted. (Chairman Palladino and Commissioners Bernthal and Zech agree.)
4. Item b(2) of Option 1 should be deleted. (Chairman Palladino and Commissioners Asselstine, Bernthal and Zech agree.)
5. The reference to 10 CFR 50.54(m)(2)(1) should be corrected to 50.54(m)(1)(i).

Commissioner Roberts provided additional comments (attached) to be included in the Federal Register Notice.

The Commission understands that the staff has given conditional approved to several licensee programs to combine the SRO/STA positions based upon the policy statement as submitted to the Commission in SECY-85-150. If the approved policy statement will cause significant difficulties for these licensees, you should so advise the Commission and indicate any actions to be taken to alleviate the situation.

A marked up copy of the modified policy statement is attached. The supplementary information that accompanies the policy statement should be modified to be consistent with the agreed upon policy statement. The revised Federal Register Notice should be returned for signature and publication in the Federal Register. A copy of the policy statement should be sent to all affected licensees. You should also advise NUMARC of the Commission's decision on the policy statement.

(EDO)

(SECY Suspense: 10/18/85)

Attachments:  
As stated

cc: Chairman Palladino  
Commissioner Roberts  
Commissioner Asselstine  
Commissioner Bernthal  
Commissioner Zech  
Commission Staff Offices  
PDR - Advance  
DCS - 016 Phillips

TMR

I am in agreement with the majority's intent that operators should be well trained and qualified to perform their duties. However, this policy, by requiring that an individual have both an SRO license and a BS degree in engineering or related science or have passed the P.E. examination prior to assuming the combined STA/SRO duties, places inordinate confidence in "academic" credentials. Strikingly absent from the policy are the specific skills or abilities needed to perform those duties. Thus, the Commission has postponed the question of what those skills should be and how they should or could be achieved and demonstrated. This leaves me no choice but to vote against the modifications proposed to the Policy Statement on Engineering Expertise on Shift. By eliminating alternatives to a Bachelor's Degree for individuals who would otherwise occupy the dual role, the Commission would be ignoring the compelling arguments made in public comments and the staff's proposal for flexibility. We would be imposing our solution without addressing the benefits that will be eliminated by not allowing flexibility. This leaves the utilities with little incentive to change from the current position, which is allowed by option 2. Since a majority of the Commission has already determined that improvement from the current program would be desirable, the Commission should provide some mechanism to move toward improvement. The proposed statement, as modified, does not provide that mechanism, and we provide no justification for overriding the staff's evaluation of the benefits that the flexibility would bring.

NUCLEAR REGULATORY COMMISSION  
FINAL COMMISSION POLICY STATEMENT ON ENGINEERING  
EXPERTISE ON SHIFT

AGENCY: Nuclear Regulatory Commission.

ACTION: Final Commission Policy Statement on Engineering Expertise on Shift.

SUMMARY: This Policy Statement presents the policy of the Nuclear Regulatory Commission (NRC) with respect to ensuring that adequate engineering and accident assessment expertise is possessed by the operating staff at a nuclear power plant. This Policy Statement offers licensees two options for providing engineering expertise on shift and meeting licensed operator staffing requirements.

Option 1 provides for elimination of the separate Shift Technical Advisor (STA) position by allowing licensees to combine one of the required Senior Reactor Operator (SRO) positions with the STA position into a dual-role (SRO/STA) position. Under Option 2, a licensee may continue with an NRC-approved STA program (i.e., a separate STA position), with certain modifications, while meeting licensed operator staffing requirements.

EFFECTIVE DATE:\*

FOR FURTHER INFORMATION CONTACT: Clare Goodman, Office of Nuclear Reactor Regulation, U. S. Nuclear Regulatory Commission, Washington, DC 20555, Telephone: 301/492-4894.

\*Insert date of publication in the Federal Register.

SUPPLEMENTARY INFORMATION:

Background

Following the accident at Three Mile Island in March 1979, a number of studies were conducted to determine why the accident occurred, what factors might have contributed to its severity, and what the industry and the NRC could do to prevent the recurrence of the same or a similar accident. These studies concluded, among other things, that a number of actions should be taken to improve the ability of shift operating personnel to recognize, diagnose, and effectively deal with plant transients or other abnormal conditions.

To address these recommended improvements, the NRC initiated both short-term and long-term efforts. The short-term effort required that as of January 1, 1980, each nuclear power plant have on duty a Shift Technical Advisor (STA) whose function was to provide engineering and accident assessment advice to the Shift Supervisor in the event of abnormal or accident conditions. The STA was required to have a bachelor's degree in engineering or the equivalent and specific training in plant response to transients and accidents. The STA requirement was identified to licensees via NUREG-0578 (July 1979)<sup>1</sup> and NUREG-0737 (November 1980) and was later mandated by plant-specific Confirmatory Orders.

Concurrently, the NRC and industry embarked on a longer-term effort aimed at upgrading staffing levels and the training and qualifications of the operating staffs, improving the man-machine interface, and increasing capabilities for responding to emergencies. At the time the STA requirement was imposed, it was intended that use of the dedicated STA would be an interim measure only until these longer-term goals were achieved.

---

<sup>1</sup>Referenced materials are available at the NRC Document Room at 1717 H Street, NW, Washington, DC 20555.

These long-term initiatives collectively result in an improvement in the capabilities and qualifications of the shift crew and their ability to diagnose and respond to accidents. These initiatives include shift staffing increases, training and qualification program improvements, hardware modifications, emphasis on human factors considerations, procedural upgrades, and development of extensive emergency response organizations to augment on-shift capabilities during abnormal conditions. They either have been or are in the process of being implemented and include the following:

- ° Every licensee of a nuclear power plant has been required to develop and implement extensive emergency response organizations for the express purpose of assisting in the diagnosis and mitigation of accidents. These organizations are required to be fully mobilized within one hour and provide substantial "engineering expertise" assistance to the shift crew to assist in accident diagnosis and mitigation/protective action strategy. All operating nuclear power plants are currently required to have emergency plans in place and to conduct exercises on a regular basis.
- ° Implementation of Supplement 1 to NUREG-0737 requires all nuclear plant licensees to conduct a Control Room Design Review (CRDR) of their facility and implement improvements identified in the human factors review. Implementation of CRDR findings will result in an improvement in the operator's ability to understand and respond to abnormal situations. This will minimize confusion during an accident and increase the likelihood of correct operator actions. All licensees have been required to submit plans and schedules for conducting the CRDR.
- ° In cooperation with the nuclear steam supply system vendor owners groups, the industry has developed symptom-based emergency operating procedures. The generic development work for these procedures has been completed. These procedures are designed to make it easier for the operators to recognize, diagnose, and effectively deal with plant transients and other abnormal conditions. They are designed to aid the operator in maintaining critical safety functions, i.e., control reactivity, remove core heat,



provide an ultimate heat sink, and contain radioactivity, thereby minimizing the probability of a serious incident. These new procedures are of significant benefit to the operator in accident diagnosis and overall response capabilities. All licensees have either implemented or are in the process of converting to these new procedures.

- ° Implementation of Supplement 1 to NUREG-0737 requires installation of a safety parameter display system (SPDS). The SPDS is a system for rapid and concise display of vital plant status indications in the event of transients or accidents. The availability of this information via the SPDS will assist the operator in performing mitigating or stabilizing actions by providing essential information in a clear and timely manner.
- ° Upgrading and installation of additional instrumentation for post-accident monitoring, as delineated in Regulatory Guide 1.97 and Supplement 1 to NUREG-0737, will assist the operator in monitoring plant status and the course of an accident. The addition of this type of instrumentation, in conjunction with benefits of the SPDS display, will enhance event diagnosis and lessen the degree of reliance on the operator's analytical ability. All licensees have provided plans and schedules for Regulatory Guide 1.97 upgrades.
- ° Effective January 1, 1984, the minimum shift crew for a single-unit plant was increased to two licensed senior reactor operators and two licensed reactor operators on each shift; similar increases were required for multi-unit plants. This has resulted in two positive effects. First, an additional senior licensed operator has been added to each shift, thereby providing one more perspective to focus attention on accident assessment and overall emergency direction. Second, one of these senior licensed operators is now required to be in the control room at all times. As a result, there is assurance that additional experienced senior level expertise will be immediately available at the onset of an accident.

- ° The industry, through the Institute of Nuclear Power Operations (INPO), has established a comprehensive, nationwide accreditation program. This program provides for upgrading of the training programs for all licensed operators as well as the training for other key positions that can directly affect plant operations. An independent Accrediting Board reviews the evaluations of each utility's training programs and either grants accreditation or defers accreditation until the programs meet high standards. Licensees are expected to have these training programs ready for accreditation by the end of 1986. These programs will ensure that operating personnel possess qualifications commensurate with the requirements of their jobs. This issue is being addressed by the Commission via a separate Policy Statement.
- ° Extensive additions have been made to utility training staffs. The number of full-time personnel per plant dedicated to training increased industry-wide by approximately 375% between 1979 and 1984. This exemplifies the increased recognition of the importance of training and requalification to the effectiveness and capabilities of the shift crew.
- ° As specified in NUREG-0737, Item II.B.4, all licensed operators receive training specifically directed at recognizing and mitigating core damage. This training serves to familiarize the operator with possible causes and symptoms of a damaged core and expected post-accident plant conditions and corrective actions. As a result, the operator is better prepared to recognize and respond to degraded plant conditions. All licensed operators are required to successfully complete this training.
- ° Simulators are now extensively used throughout the industry; 10 were in use in 1979; at the end of 1984, 40 were in use; and a total of 69 simulators are now in operation or are planned. Additionally, NRC criteria for operator licensing now require simulator training. The use of simulators provides more comprehensive training for the operator and allows him to experience transients and accidents in a training



environment. The increased use of simulators will improve the capabilities of the shift crew to respond to emergencies.

- ° The industry, through INPO, has developed and implemented a comprehensive system for gathering and analyzing information on events that occur in the industry and providing feedback to operating personnel. This allows other licensees to revise their facility design or operation, as necessary, based on the lessons learned in the industry. The NRC endorsed INPO's "SEE-IN" program in Generic Letter 82-04 as acceptable for meeting the information-gathering elements of NUREG-0737, Item I.C.5.

Collectively, these initiatives result in a significant enhancement of the capabilities of the shift crew to diagnose and mitigate accidents.

#### Draft Policy Statement

On July 25, 1983, the Commission published in the Federal Register (48 FR 33781) a Draft Policy Statement on Engineering Expertise on Shift to reassert the Commission's belief that adequate engineering and accident assessment expertise must be available to the operating crew at all nuclear power plants.

The Draft Policy Statement on Engineering Expertise on Shift offered licensees of nuclear power plants and applicants for operating licenses two options for meeting the staffing requirements of 10 CFR 50.54(m)(2) and the requirement in NUREG-0737, Item 1.A.1.1 for a Shift Technical Advisor (STA). Option 2 gave them the opportunity to combine the licensed Senior Operators' (SRO) and Shift Technical Advisors' (STA) functions. Licensees that did not want to combine the SRO and STA functions could continue with their approved STA program in accordance with the description in NUREG-0737, "Clarification of TMI Action Plan Requirements."

Interested persons, applicants, and licensees were invited to submit written comments to the Secretary of the Commission. Following consideration of the

comments, the Commission amended the Draft Policy Statement, as discussed in the following sections.

Comments on the Draft Policy Statement

A total of 34 responses were received and evaluated. The public comments related primarily to the combined SRO/STA position. The following discussion highlights the major points raised in the comments and the resolution of those comments. A detailed analysis of all public comments and their resolution was also prepared. (Copies of those letters and the detailed analysis of all the public comments are available for public inspection and copying for a fee at the NRC Public Document Room at 1717 H Street N.W., Washington, DC 20555.)

Of the 34 letters received, 18 included support for the flexibility provided by the Policy Statement. The major points made in the public comments were as follows:

1. Support for the Policy Statement;
2. Opposition to combining the functions of the SRO and the STA;
3. Opposition to a bachelor's degree requirement for the SRO/STA position;
4. Recommendation that equivalency to a bachelor's degree be further defined;
5. Concern that a bachelor's degree requirement for the SRO/STA position would result in a higher turnover rate and potentially blocked career paths for operators; and
6. Reference to a proposed bachelor's degree requirement for the Shift Supervisor, believed to be currently under NRC consideration.

A general description of the major public comments and responses to these are as follows:

1. Support for the Policy Statement -

Eighteen commentors favored the option offered in the Draft Policy Statement of combining the SRO and STA functions into one dual-role position. They endorsed the flexibility provided by the Policy Statement. They supported the view that it is beneficial to combine engineering expertise with operating experience.

2. Opposition to the Dual-Role SRO/STA Position -

Four individual commentors stated that there is a possibility that the person in the dual-role position would function as an additional operator in the event of an abnormal occurrence instead of being available to provide the engineering and accident assessment expertise necessary in these circumstances. In response, the Commission notes it is the intent of the Policy Statement that the person in the dual-role position have specific training in accident assessment and provide that expertise during an abnormal occurrence. The staffing levels required by 10 CFR 50.54(m)(2), which became effective January 1, 1984, increased the number of operators and Senior Operators on shift after the initial STA position was required. This increase in shift personnel would allow the SRO/STA to provide both accident assessment expertise and to analyze and respond to off-normal events when needed. Experience has shown that an STA, who is also an SRO, is better accepted by the shift crew. Therefore, the assessment and direction by an SRO/STA in an off-normal event might be better accepted by the crew than assessment and advice by a separate STA.

3. Opposition to a Bachelor's Degree for the SRO/STA Position -

Several commentors felt that the person who filled the SRO/STA position should not be required to have a bachelor's degree. The Commission notes that since NUREG-0737, Item I.A.1.1, specified that the STA should have a

bachelor's degree or the equivalent in a scientific or engineering discipline, the degree requirement is not new. This continues to be the educational requirement for a dedicated STA. However, the educational requirements for the dual-role (SRO/STA) position have been changed to allow the individual to meet one of several educational alternatives or have four years of experience as a licensed operator at an operating nuclear power plant and have successfully completed INPO-accredited STA and SRO training programs.

4. Recommendation that Equivalency to a Bachelor's Degree Be Further Defined -

Many commentors stated that the equivalency options were too restrictive or required clarification. In response, the Commission notes that a bachelor's degree in engineering is no longer a basic requirement but is one of several educational alternatives. The term "equivalent" has been deleted.

Changes related to educational alternatives are summarized below:

- ° Most states require a bachelor's degree of the individual who has the designation of PE or EIT. Other states do not presently require a degree or have not in the past; however, they have a provision which allows registration of these individuals if they meet the stringent requirements of a state board of registration through a combination of experience, examination, long-established practice and eminence. Although the requirements vary from state to state, they all require the applicants to show evidence that their engineering work experience is at a grade and of a type satisfactory to the state board. Many states require that a portion of the applicant's engineering work experience be at a level of direct control and supervision of engineering work. The majority of states also require that the individual successfully pass a fundamentals of engineering examination or the principles and practice of engineering examination, or both. In

light of these rigorous state requirements, the PE and EIT options remain acceptable alternatives.

- ° Other bachelor's degrees determined to be acceptable alternatives are a bachelor's degree in engineering technology from an accredited institution or a bachelor's degree in a physical science from an accredited institution. These degree programs are acceptable provided that they include course work in the physical, mathematical, and/or engineering sciences. These requirements are intended to ensure that the individual has substantial knowledge and understanding of the physical and mathematical sciences and the principles of engineering.
  - ° Another acceptable alternative requires successful completion of the technical portion of a bachelor's degree in engineering or engineering technology from an accredited institution. The technical portion of an engineering or engineering technology degree program is acceptable provided that it is comprised of courses in the physical, mathematical and engineering sciences. The Commission will find this alternative acceptable if it receives a communication from the credit-granting university that all the technical courses required in its engineering or engineering technology degree program have been successfully completed. Since names of courses and amount of credit vary from university to university, the Commission will not specify the technical courses required for this alternative. However, individuals who have completed 80 semester hours in the physical, mathematical and engineering sciences will be considered acceptable and will not require a communication from the university. The 80 semester hours requirement is based on the ABET accreditation criteria for the basic requirements of a bachelor's degree in engineering.
5. Concern that a Bachelor's Degree Requirement Would Result in a Higher Turnover Rate and a Potentially Blocked Career Path for Shift Employees -

Several commentors expressed concern that degreed individuals would leave for other positions in the plant, contributing to a high turnover rate on shift. Another concern of commentors was that career paths to the senior operating positions would be blocked for those individuals without degrees. In response, the Commission notes that since the bachelor's degree in engineering is no longer a basic requirement for the SRO/STA, but is only one of several educational alternatives, this should not affect career paths for individuals without a degree nor should it contribute to a high turnover rate.

6. Reference to a Proposed Bachelor's Degree Requirement for the Shift Supervisor -

A few commentors on the Federal Register notice took the opportunity to comment on whether a bachelor's degree should be required for specific positions in the operating staff of nuclear power plants, and in particular, for the Shift Supervisors' position.

The Final Policy Statement on Engineering Expertise on Shift does not address the issue of requiring a degree for the Shift Supervisor. Early in 1984, the staff considered a "proposed Rulemaking Concerning Requirements for Senior Managers" in SECY-84-106. This proposed rulemaking would have required that an additional degreed, SRO-licensed individual be assigned to each shift of a nuclear power plant who would be responsible for managerial direction of all plant functions including chemistry, health physics, maintenance, operations, security, and technical services. Following several meetings with the staff and industry representatives, the Commission concluded that this proposed rulemaking was not warranted, and it was disapproved. One of the primary bases for the proposed senior manager rule was the need to provide engineering expertise to the shift crew, which is also the primary objective of this Policy Statement.



### Development of Final Policy Statement

As a result of the analysis of public comments received, the Commission clarified and expanded the educational alternatives of the dual-role (SRO/STA) position. The revisions to the Draft Policy Statement resulted in SECY-84-355, a draft Final Policy Statement on Engineering Expertise on Shift.

The main difference between the Draft Policy Statement and SECY-84-355 concerns the educational qualifications for the dual-role position. The Draft Policy Statement required, of the person filling the dual-role position, a baccalaureate degree in engineering or related sciences or one of three equivalents to the degree. SECY-84-355 required a bachelor's degree in engineering from an accredited institution or one of five acceptable alternatives to the engineering degree.

The staff met with the Commissioners on November 5, 1984, to discuss SECY-84-355. As a result of that meeting, the Commissioners directed the staff to coordinate the Policy Statement on Engineering Expertise on Shift with the Nuclear Utilities Management and Human Resources Committee (NUMARC). This Final Policy Statement is the result of the Commissioners' direction, staff analysis, resolution to public comments, and staff coordination with NUMARC.

The major change from the Draft Policy Statement to this Final Policy Statement is the qualification requirements for the dual-role position (SRO/STA). The Draft Policy Statement required a baccalaureate degree or equivalent in engineering or related sciences. The Final Policy Statement requires that one of several educational alternatives be met or that a licensed operator have four years experience as a licensed operator at an operating nuclear power plant and have successfully completed INPO-accredited STA and SRO training programs. Hence, the Final Policy Statement accepts college-level training instead of formal college education for the dual-role position.

Finally, although the Final Policy Statement includes an option which allows for the continued use of the STA position, as did the Draft Policy Statement, the former encourages licensees to work towards having the STA assume an active role in shift activities.

While it is the Commission's preference that licensees move toward the dual-role (SRO/STA) position, continuation of an approved STA program remains an acceptable option. The Commission acknowledges that some licensees may prefer the dedicated STA position for a number of reasons. The Commission also recognizes the advantages of integrating the qualifications and training of the STA into the licensed operating staff. Thus, this Policy Statement is structured to allow different means for ensuring that the plant operating staff has adequate engineering and accident assessment expertise.

#### Policy Statement

The Commission continues to stress the importance of providing engineering and accident assessment expertise on shift. The term "accident assessment" is defined as immediate actions needed to be taken while an event is in progress. This Policy Statement does not require any changes in the formal education and training of operators and senior operators not expected to fulfill the dual-role SRO/STA position.

The intent of this policy guidance may be satisfied by either of the options described below. The Commission prefers a combined SRO/STA position (Option 1). In addition, in the long term, the Commission would prefer that the STA be combined with the Shift Supervisor position.

Either Option 1 or Option 2 may be used on each shift. A utility may use Option 1 on some shifts and Option 2 on other shifts, or may use the same option on every shift. If Option 1 is used for a shift, then the separate STA position may be eliminated for that shift.

Option 1: Combined SRO/STA Position

This option is satisfied by assigning an individual with the following qualifications to each operating shift crew as one of the SROs (preferably the Shift Supervisor) required by 10 CFR 50.54(m)(2)(1):

- a. Licensed as a senior operator on the nuclear power unit(s) to which assigned, and
- b. Completion of <sup>one</sup> ~~either~~ of the following training and educational requirements: ~~((1) or (2))~~:

(1) Meets the STA criteria of NUREG-0737, Item I.A.1.1, and one of the following educational alternatives:

- (a) Bachelor's degree in engineering from an accredited institution;
- (b) Professional Engineer's (PE) license *obtained by successful completion of the PE examination*
- ~~(c) Successful completion of the Engineer-in-Training (EIT) examination;~~
- (d) Bachelor's degree in engineering technology (BET) from an accredited institution, including course work in the physical, mathematical, and/or engineering sciences;
- (e) Bachelor's degree in a physical science from an accredited institution, including course work in the physical, mathematical, and/or engineering sciences; or
- ~~(f) Successful completion of the technical portion of a bachelor's degree in engineering or engineering technology from an accredited institution. The technical portion should be comprised of courses in the physical, mathematical, and engineering sciences.~~

- (2) Four years of experience as a licensed operator at an operating nuclear power plant and successful completion of INPO-accredited STA and SRO training programs. The programs described in the INPO Guidelines "Nuclear Power Plant Shift Technical Advisor: Recommendations for Position Description, Qualifications, Education, and Training," and either "PWR Control Room Operator, Senior Control Room Operator, and Shift Supervisor Qualification" are acceptable to satisfy the requirements for STA and SRO training. It is not the intent of this policy guidance to require that personnel who complete STA or SRO training programs prior to their accreditation by INPO be required to repeat that training subsequent to INPO accreditation, except for participation in continuing training. The items added to the programs as a result of accreditation would be included in the next training cycle.

Option 2: Continued Use of STA Position

This option is satisfied by placing on each shift a dedicated Shift Technical Advisor (STA) who meets the STA criteria of NUREG-0737, Item I.A.1.1. The STA should assume an active role in shift activities. For example, the STA should review plant logs, participate in shift turnover activities, and maintain an awareness of plant configuration and status.

The Commission recognizes that several years may be required to meet this policy guidance. For the interim period, continuation of an STA program that meets the guidance of NUREG-0737, Item I.A.1.1 is acceptable. Licensee proposals different than the two options described above will be considered by the staff on a case-by-case basis.

To eliminate the STA position, a licensee of an operating reactor should apply for a modification to its license and an applicant for an operating license should modify its Final Safety Analysis Report to reflect elimination of the STA position and a commitment to provide a required SRO on shift with the qualifications described in Option 1 above.

NRC will accept a utility's modifications if it finds that the proposal meets the intent of this Policy Statement. On a case-by-case basis, utilities with multi-unit sites with dual-licensed SROs will ensure that an adequate number of licensed staff are available and that engineering expertise can be provided when needed. It is the intent of this Policy Statement to ensure that adequate engineering and accident assessment expertise is possessed by the plant operating staff.

Dated at Washington, DC, on this \_\_\_\_ day of \_\_\_\_\_, 1985.

For the Nuclear Regulatory Commission,

---

Samuel J. Chilk,  
Secretary of the Commission.