



Relocate Unit Staff Qualifications from Technical Specifications to QAPD

Pre-Submittal Meeting - September 25, 2025



Agenda

- Introduction
- Background
- Proposed Technical Specification Change
- Planned Implementation
- Precedents
- Schedule



Background

Relocate personnel qualification requirements of TS Section 5.3.1 to Quality Assurance Program Description (QAPD)

- Consistent with efforts to relocate TS administrative items into documents under licensee control (e.g., 10 CFR 50.59, 10 CFR 50.54(a), 10 CFR 50.55a, etc.) obviating license amendments for changes
 - Quality Assurance Requirements
 - Site Organization and Management Titles
 - Offsite Dose Calculation Manuals
 - Technical Requirements Manual – non-10 CFR 50.36 TS elements
 - Inservice Testing and Inspection Programs



Proposed Technical Specification Changes

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

- 5.3.1 ~~Each member of the unit staff with the exception of operator license applicants, shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, September 1975 and ANSI/ANS 3.1-1978, except the Director, Site Radiation Protection shall meet or exceed the qualification of Regulatory Guide 1.8, September 1975, and the Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and plant operating characteristics, including transients and accidents.~~
- 5.3.2 The education and experience eligibility requirements for operator license applicants, and changes thereto, shall be those previously reviewed and approved by the NRC, specifically those referenced in letter 102-04930-GRO/TNW/RJR, dated April 25, 2003.
- 5.3.3 For the purpose of 10 CFR 55.4, a licensed senior reactor operation (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.2, perform the functions described in 10 CFR 50.54(m).
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referenced for comparable positions as specified in the Palo Verde Quality Assurance Program Document.



Planned Implementation

- Each relocated element of existing TS 5.3.1 issued as revision to the QAPD consistent with industry precedents
- Once relocated in the QAPD, appropriate 10 CFR 50.54(a) assessment to adopt NRC endorsed personnel qualification requirements (i.e., from ANSI/ANS 3.1-1978/RG 1.8 Rev 1, to ANSI/ANS 3.1-2014/RG 1.8 Rev 4)
- Job descriptions and training requirements updated to NRC endorsed standards as part of implementation under licensee control



Precedents

- March 27, 2017, NRC issued TS amendments to Browns Ferry and Sequoyah Nuclear Plants to revise Unit Staff Qualifications to delete the references to RG 1.8 Revision 2 and replace them with references to the TVA Nuclear Quality Assurance Plan
- August 2, 2018, NRC issued TS amendments to Exelon Generation Company, LLC for a Fleet License Amendment Request to relocate TS Unit/Facility/Plant Staff Qualification ANSI N18.1-1971 and ANSI/ANS-3.1-1978 Requirements to the Exelon Quality Assurance Topical Report (QATR)



Schedule

- Pre-submittal Meeting – September 25, 2025
- Planned Submittal – October 3, 2025
- Requested Approval – 5 months (March 2026)
- Implementation – 90 days (June 2026)





Questions