

February 8, 2000

Alfredo W. Meren, Reactor Supervisor
Aerotest Radiography and Research Reactor
Aerotest Operations, Inc.
3455 Fostoria Way
San Ramon, CA 94583

Dear Mr. Meren:

SUBJECT: REVISIONS TO THE OPERATOR REQUALIFICATION PROGRAM FOR THE AEROTEST RADIOGRAPHY AND RESEARCH REACTOR (TAC NO. MA7795)

Your letter of December 3, 1999, proposed a change to the Operator Requalification Program (the program). The change was from a minimum passing grade for written examinations from 80% to 70%. As stated in your letter, this is consistent with NRC guidance in the Non-Power Reactor Operator Licensing Examiner Standards (NUREG-1478). Therefore, the proposed change is acceptable.

As we discussed by telephone on January 3 and 13, 2000, our review of the Operator Requalification Program raised a few other issues that Aerotest may wish to consider. These issues are to ensure that the program provides more specific requirements to ensure that regulations continue to be satisfied and that the program continues to be comprehensively implemented.

First, section IV "EVALUATION" states that examinations are given "for the following year," or annually. As we discussed, the regulations of 10 CFR 55.59(a) only require a written examination every two years and an operating test annually. A change to the Operator Requalification Program would be needed to allow written examinations only every two years.

Further, we also discussed that an annual operating test ("walkthrough") is given after the written examination, although the operating test is not specifically mentioned in the Operator Requalification Program. To clarify the requirements, the conduct of the annual operating test ("walkthrough") should be incorporated into the Operator Requalification Program, or acceptable alternative and justification provided.

Section VI "INACTIVE STATUS" of the Operator Requalification Program specifies that if a licensee has not been actively performing their licensed functions for a period in excess of four months they shall demonstrate qualification through written and operational examinations to the satisfaction of the facility management prior to resuming license activities. The regulation, 10 CFR 55.53(e), specifies that a reactor operator (RO) or a senior reactor operator (SRO) must perform their respective functions for at least four hours per calendar quarter, i.e., three months. Further, 10 CFR 55.53(f) specifies that before the RO/SRO can resume the functions authorized by their license, an authorized representative of the facility shall certify

that (1) the qualifications and status are current and valid, and (2) the RO/SRO completed a minimum of six hours under the direction of a RO or SRO as appropriate. The program should be revised with more specific wording to ensure consistency with these regulations, or acceptable alternative and justification provided.

Many research reactors have found it useful to specify the examination requirements for the individual that prepares and administers the written and operating examinations to ensure regular requalification of all individuals. For example:

Exemption from operating and written examinations for the individual preparing and administering examinations will be allowed. The individual preparing and administering examinations for one requalification cycle will not be exempt from the next iteration of examinations. That is, a RO/SRO who develops and administers an examination for one cycle will take the examination the next requalification cycle.

Aerotest should consider incorporating such a provision in the program, or providing acceptable alternative and justification.

If you have any question, please do not hesitate to call me at (301) 415-1128.

Sincerely,

/RA/

Marvin M. Mendonca, Senior Project Manager
Events Assessment, Generic Communications, and
Non-Power Reactors Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket No. 50-228

cc: Please see next page

Aerotest

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cc:

Ray Tsukimura, President
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Director
Energy Facilities Siting Division
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1516 - 9th Street
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Mr. Steve Hsu
Radiological Health Branch
State Department of Health Service
P.O. Box 942732
Sacramento, CA 94234-7320

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A. W. Meren, Reactor Supervisor

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