

### Commissioner Merrifield's Comments on SECY-99-244

Before presenting my views on the location of the NRC's Technical Training Center (TTC) and the appropriate number of simulators, I want to express my appreciation to the TTC staff for their record of outstanding performance. Having taken a training course at the TTC, I can attest to the outstanding professionalism, competency, and dedication of the TTC staff. As I considered the options presented in SECY-99-244, I carefully considered not only the training needs of the agency, but the personal and professional impacts on the TTC staff and the potential loss of highly capable training staff. I also carefully considered the information presented by representatives of the Chattanooga Chamber of Commerce and the Tennessee Congressional delegation. The intangible, personal, and economic aspects of this matter made my decision so very difficult.

I do not support any of the four options presented by the staff in SECY-99-244. Instead, I support moving all four simulators to headquarters and moving the TTC staff to headquarters using the staff transition plan outlined in Option 4. Specifically, I recommend that we:

1. Maintain a small staff in Chattanooga during FY 2001 - FY 2002 for implementation of simulator training.
2. Move the other TTC staff members to headquarters by mid-FY 2001.
3. Move all four simulators (CE, B&W, GE, and Westinghouse) simulators and remaining TTC staff members to headquarters by the end of FY 2002.

First, let me address the issue of moving the TTC from Chattanooga to the headquarters area. Few would argue that our simulators are tremendous assets to the agency. Yet, it is clear to me that, due to their remote location, these assets are not being utilized to their fullest potential. Thus, for me, the most compelling reason to move the TTC staff and simulators to the Rockville area is to increase the use of the simulators by headquarters offices for such things as reactor technology training, research, and event analysis.

The NRC and the nuclear industry will experience tremendous change in the coming years with the adoption of a new reactor oversight process, the transition to more risk-informed regulation, the increasing use of emerging technologies, the deregulation of the electric industry, and the challenges associated with an aging workforce. In addition, the Government Performance and Results Act (GPRA) and increasing budgetary pressures will drive the agency to meet these challenges in a more efficient and effective manner, and with fewer resources. To be successful, the NRC must have a highly trained workforce and a vibrant and accessible technical training program. In my view, the current level of headquarters staff participation in TTC training courses is inadequate to meet the future needs of the agency. It is essential that our headquarters staff, a staff which not only represents a majority of our workforce but one which faces the greatest technical challenges, has greater access to reactor technology training and make better use of agency simulators for training purposes. With an aging technical workforce in headquarters, it is imperative that the agency establish a more robust technical training program in Rockville; one that is more accessible to new, less experienced Project Managers and technical reviewers. Failure to do so could jeopardize our ability to maintain a highly qualified technical workforce. The new reactor oversight process and the agency's pursuit of risk-informed regulation will also demand better integration of our technical training and regulatory training. Furthermore, the rapidly changing regulatory environment and the emergence of new technologies will require our TTC staff to work more closely with technical

subject experts, and to be more aware of current agency activities and perspectives which could then be more easily incorporated within training courses. It is my view that the best way to achieve these goals is by moving the TTC staff and simulators to headquarters.

The agency should also place greater emphasis on using our simulators to assist staff in non-training matters. For example, our technical and inspection staff should more effectively utilize our simulators in the agency's assessment of plant events and in its incident response preparation. Our research staff should have greater access to our simulator facilities and utilize them to support research initiatives associated with such issues as human performance, digital instrumentation and controls, and accident and risk analysis. Again, it is my view that the best way to accomplish these goals is by moving the TTC staff and simulators to headquarters.

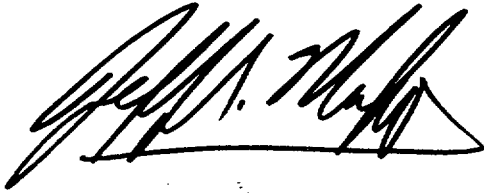
On November 9, 1999, the Commission was briefed by representatives of the TTC staff and union representatives on their views regarding relocation of the TTC to Rockville and the appropriate number of simulators to be retained. During that briefing, the representatives raised concerns regarding managerial challenges associated with having the TTC in Rockville. These challenges included potential class interruptions, competing work interests, and competing family interests. In a memorandum to the Commission dated November 24, 1999, the EDO described ways in which these challenges can be managed. The EDO reiterated that it is well within management's ability to adequately control situations which could interfere with effective training. I am confident that NRC management can implement strong administrative and managerial controls to overcome the challenges outlined by the TTC and union representatives. The Commission and EDO should settle for nothing less.

Now I will discuss my rationale for maintaining all four simulators. Historically, the CE and B&W designs, including their systems design, transient response, and emergency procedures were deemed to be sufficiently different from the GE and Westinghouse designs that separate vendor-specific simulator training programs were warranted. The staff has stated that it believes that vendor-specific knowledge and skills are necessary for successful job performance including the risk-informed baseline inspection program, characterization of the risk significance of inspection findings in the assessment process, and use of risk information matrices for inspection planning. However, the staff goes on to state that the added value of CE and B&W simulator training is not sufficient in comparison with the relatively high cost per student.

Given the industry's increasing interest in license renewal, it is likely that the NRC will have to maintain its proficiency in CE and B&W technology for many years to come. I agree with the staff that an adequate level of knowledge and skills related to CE and B&W designs can be obtained through enhanced classroom training and on-the-job training. I also agree that staff observation of licensee site-specific simulator training can be used to supplement CE and B&W classroom training. However, I believe the staff, in narrowly focusing on the high cost per student of the CE and B&W simulators, missed an important opportunity to identify ways in which simulator utilization could be improved and failed to adequately account for the increased usage that would certainly be realized if those simulators were located in Rockville. For example, in addressing the programmatic considerations for TTC location, the staff states that the use of reactor technology training by headquarters offices would most likely increase if the TTC were located in Rockville. Yet, in discussing the programmatic considerations for the number of simulators, the staff uses historical utilization data and does not account for greater simulator use in its cost per student figures. I believe realistic projections with respect to increased use of the simulators by headquarters staff would result in favorable cost per student estimates for both the CE and B&W simulators. My support for maintaining four simulators is reinforced by the relatively small incremental cost differential associated with moving four versus two simulators to the Rockville area. Thus, I am not compelled by the basis the staff

used to recommend that the CE and B&W simulators be decommissioned. These simulators are valuable agency resources that should not be casually discarded. Instead, I recommend that the staff place greater emphasis on increasing their use, especially by headquarters staff. Once the simulators are moved to headquarters and the staff gains experience with respect to simulator utilization, the agency can revisit the issue of whether to retain the CE and B&W simulators.

Although this was a difficult decision, I believe moving all four simulators to headquarters will ultimately enhance our ability to carry out our mission of protecting public health and safety.

A handwritten signature in black ink, appearing to read "Jeff A. Mahan". The signature is stylized with a large, sweeping initial "J" and "M".

2/22/00



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 24, 2000

SECRETARY

MEMORANDUM TO: William D. Travers  
Executive Director for Operations

FROM: Annette Vietti-Cook, Secretary *Annette Vietti-Cook*

SUBJECT: STAFF REQUIREMENTS: SECY-99-244 - LOCATION OF THE  
NRC'S TECHNICAL TRAINING CENTER AND APPROPRIATE  
NUMBER OF SIMULATORS

After carefully considering the staff proposals contained in SECY-99-244 and the views of the staff of the Technical Training Center, the National Treasury Employees Union, the Chattanooga Chamber of Commerce, and representatives of the Tennessee Congressional delegation, the Commission has decided to retain all four current simulators and to move the Technical Training Center (TTC) from its current location in Chattanooga, Tennessee, to a location in close proximity to the NRC headquarters on a schedule consistent with the staff's proposal in option 4 of the paper. In reaching this decision, the Commission recognizes that all four simulators, the TTC as an organization, and the TTC staff are valuable agency resources that will continue to be needed in the future as the industry and the NRC proceed with license renewal and other regulatory initiatives. The Commission also believes, however, that an already excellent NRC training program can be improved by co-locating the TTC in the headquarters area to ensure that these NRC assets are utilized to their fullest potential. The staff is therefore directed to take the following actions:

maintain a small staff in Chattanooga during FY 2001-mid FY 2003 for implementation of simulator training;

complete the relocation of the other TTC staff members to the headquarters area by end of FY 2001;

(EDO) (SECY Suspense: 09/28/2001)

move all four simulators and remaining TTC staff members to the headquarters area by the middle of FY 2003 depending on the availability of space;

(EDO) (SECY Suspense: 03/14/2003)

ensure, as a very high priority, that the implementation of the move does not impose any unnecessary personal burdens on the TTC staff by taking appropriate measures to meet transitional needs of the TTC employees and their families;

(EDO) (SECY Suspense: As appropriate)

develop appropriate administrative and management controls to ensure that training disruptions at the new location are minimized;

(EDO) (SECY Suspense: 09/24/2002)

develop a comprehensive, integrated training plan that links the abilities needed to implement the NRC mission to training course offerings and that takes advantage of the availability of key program office personnel to enrich the TTC course offerings; and

(EDO) (SECY Suspense: 09/29/2000)

pursue with the General Services Administration as a very high priority a location for the TTC at or very near the White Flint Site.

(EDO) (SECY Suspense: 09/29/2000)

cc: Chairman Meserve  
Commissioner Dicus  
Commissioner Diaz  
Commissioner McGaffigan  
Commissioner Merrifield  
OGC  
CFO  
CIO  
OCA  
OPA  
OIG  
PDR  
DCS