U.S. NUCLEAR REGULATORY COMMISSION

STANDARD REVIEW PLAN

OFFICE OF NUCLEAR REACTOR REGULATION

13.2.1 REACTOR OPERATOR TRAINING

REVIEW RESPONSIBILITIES

Primary - ~~Operator Licensing Branch (OLB)~~ Human Factors Assessment Branch (HHFB)[1]

Secondary - None

I. AREAS OF REVIEW

The applicant's reactor operator training program, as described in ~~his~~ the safety analysis report (SAR), is reviewed.[2] This section of the SAR should contain the description and scheduling of the training program for reactor operators and senior reactor operators. The training program should also include upgrading in reactor operator and senior reactor operator qualification per the items I.A.2.1~~, I.A.2.3,~~[3] ~~I.A.3.1~~[4] and II.B.4 of the TMI Action Plan (NUREG-0737). The training program also includes the requalification program as required in 10 CFR 55.59.[5]

A. ~~For the Preliminary Safety Analysis Report (PSAR)~~Construction Permit (CP) or Standard Design Certification (DC)[6]:

1. The proposed subject matter of each course, the duration of the course (approximate number of weeks in full time attendance), the organization teaching the course or supervising instruction, and the position titles for whom the course is given. The subjects covered should include as a minimum, those contained in ~~Sections 21 and 22 of 10 CFR Part 55~~ 10 CFR 55.41, 55.43, and 55.45[7] for reactor operators and senior reactor operators as appropriate. The subjects covered should also include those required by item I.A.2.1 of the TMI Action Plan (NUREG-0737), enclosures 2 and 3 of the Letter from H. R. Denton, NRC, to All Power Reactor Applicants and Licensees, dated March 28, 1980 (see NUREG-0737). The requalification program

should include the content described in 10 CFR 55.59,[8] or should be based on the use of the systems approach to training defined in 10 CFR 55.4.[9]

2. ~~Reactor operations experience training by nuclear power plant simulator that complies with Regulatory Guide 1.149 or assignment to a similar plant, including length of time (weeks), and identity of simulator and plant.~~ Applicants should describe their program for providing simulator capability for their plants as described in 10 CFR 55.45, 10 CFR 50.34(f)(2)(i), and Regulatory Guide 1.149.[10] [11] In addition, they should describe how they will ~~assure~~ ensure[12] that their proposed simulator will correctly model their control room. ~~Applicants should provide sufficient information to verify that they will have the necessary simulator capability to carry out the actions described in item I.A.3.1 of the TMI Action Plan (NUREG-0737) and I.A.4.2 of NUREG-0718.~~[13] Applicants should submit, prior to issuance of construction permits or other submittal[14], a general discussion of how the requirements will be met. Sufficient details should be presented to provide reasonable assurance that the requirements will be implemented properly prior to the issuance of a ~~operating~~[15] license.

3. A commitment to conduct an onsite formal training program and on-the-job training before the initial fuel loading.

~~4. Any difference in the training programs for individuals who will be seeking licenses prior to criticality pursuant to Section 55.25 of 10 CFR Part 55 based on the extent of previous nuclear power plant experience. Experience groups should include the following:~~

~~a. Individuals with no previous experience.~~

~~b. Individuals who have had nuclear experience at facilities not subject to licensing.~~

~~c. Individuals who hold, or have held, licenses for comparable facilities.~~[16]

~~5~~4. The means for evaluating the training program effectiveness for all reactor operators, in accordance with the systems approach to training.[17] ~~This includes the means to be employed to certify that each precritical applicant has had extensive actual operating experience pursuant to Section 55.25(b) of 10 CFR Part 55.~~[18]

~~6~~5. This program description should also include a chart to show the schedule of the training program for the personnel to be licensed prior to criticality. The time should be relative to expected fuel loading and should also display the preoperational test period, and the expected time for examinations for licensed operators prior to plant criticality.

~~7~~6. The training program should also include upgrading in reactor operator and senior reactor operator qualification per the item I.A.2.1 of the TMI Action Plan.

B. ~~In the Final Safety Analysis Report (FSAR)~~Operating License (OL) or Combined License (COL)[19]:

1. The proposed subject matter of each course, including a syllabus or equivalent course description, the duration of the course (approximate number of weeks in full-time attendance), the organization teaching the course or supervising instruction, and the position titles for which the course is given.
The subjects covered should include as a minimum, those contained in ~~Sections 21 and 22 of 10 CFR Part 55~~ 10 CFR 55.41, 55.43, and 55.45[20] for reactor operators and senior reactor operators as appropriate. The subjects covered should also include those required by item I.A.2.1 of the TMI Action Plan and Enclosures 2 and 3 of the Letter from H. R. Denton, NRC, to All Power Reactor Applicants and Licensees, dated March 28, 1980 (see NUREG-0737, item I.A.2.1). The requalification program should include the content described in 10 CFR 55.59.[21] The course content should reflect the use of the systems approach to training defined in 10 CFR 55.4.[22]

2. Reactor operations experience training by nuclear power plant simulators that complies with Regulatory Guide 1.149 or assignment to a similar plant, including length of time (weeks), and identity of simulator and plant. The applicant should provide the details of the program for simulator training including length of time (weeks) and the ~~identity of the~~ simulator facility as required by 10 CFR 55.45(b).[23] ~~If a nonplant specific simulator or no simulator training is to be provided adequate information should be given for this position.~~

3. The details of the onsite training program, including a syllabus or equivalent course description, the duration of the course (approximate number of weeks in full time attendance). The program should distinguish between classroom training and on-the-job training, before and after the initial fuel loading.

4. The organization teaching the course or supervising instruction and the qualification of the instructors in the training program should be provided including the requalification program administered to the instructor in order to have them remain certified as instructors as specified in H. R. Denton's letter of March 28, 1980 (see Enclosure 1, item 2d).

5. Training for mitigating core damage as described in Item II.B.4 of the TMI Action Plan (see NUREG-0737, item II.B.4).

6. Upgrading of reactor operator and senior reactor operator training qualification as described in item I.A.2.1 of the TMI Action Plan (see NUREG-0737, item ~~II~~I.A.2.1).[24]

~~7. Any difference in the training programs for individuals who will be seeking licenses prior to criticality pursuant to Section 55.25 of 10 CFR Part 55 based on the extent of previous nuclear power plant experience. Experience groups should include the following:~~

~~a. Individuals with no previous experience.~~

~~b. Individuals who have had nuclear experience at facilities not subject to licensing.~~

~~c. Individuals who hold, or have held, licenses for comparable facilities.~~[25]

~~8~~7. Means for evaluating the training program effectiveness for each operator in the program, as part of the use of the systems approach to training.[26] ~~For applicants for license examinations prior to criticality, the means to be employed to certify that each applicant has had extensive actual operating experience pursuant to Section 55.25(b) of 10 CFR Part 55.~~[27]

The program description section should also include a chart to show the schedule of or each part of the reactor operator training program. The time scale should be relative to expected fuel loading and should also display the preoperational test period, expected time for examinations for licensed operators prior to criticality, and expected time for examinations for licensed operators after criticality.

The description should delineate clearly the extent to which the training program has been accomplished at the approximate time of submittal of the FSAR. Contingency plans for additional training for individuals to be licensed prior to criticality should be described in the event fuel loading is subsequently delayed from the date indicated in the FSAR.

The FSAR should describe the applicant's plans for requalification training for licensed operators and senior operators. Applicants should also describe the requalification program for plant instructors to ~~assure~~ ensure they are cognizant of current operating history, problems, and changes to procedures and administrative limitations ~~(See NUREG-0737, item I.A.2.3)~~.[28]

II. ACCEPTANCE CRITERIA

The SAR should demonstrate that the training provided, or to be provided, for reactor operators and senior reactor operators will be adequate to provide assurance that all reactor operator qualification requirements including TMI Action items will be met as of the time needed, i.e., prior to operator license examinations, prior to fuel loading, or prior to appointment or reappointment to the position.

Criteria for acceptability as they relate to training for reactor operators and senior reactor operators are:

1. The training requirements and guidance set forth in the following regulations and regulatory guides should be met or acceptable alternatives should be presented.

   a. 10 CFR Part 50, Section 50.54, items i through m.

   b. 10 CFR Part 55, Sections ~~55.21, 55.22, 55.23, and Appendix A~~ 55.41, 55.43, 55.45, and 55.59.[29]

   c. Regulatory Guide 1.8.[30]

   d. NRC Operator Licensing Guide, NUREG-0094.

   e. TMI Action Plan Requirements items I.A.2.1~~, I.A.2.3,~~[31] ~~I.A.3.1,~~ [32] and[33] II.B.4 (NUREG-0737)~~, and I.A.4.2 of NUREG-0718~~.[34] Letter from H. R. Denton, NRC, to All Power Reactor Applicants and Licensees, dated March 28, 1980.

   f. 10 CFR 55.45(b) and 10 CFR 50.34(f)(2)(i), which specify requirements related to the use and capability of simulation facilities.[35]

   g. NUREG-0711, which provides guidance on the training program as part of the Human Factors Engineering Program Review Model.[36]

2. Simulators used for training plant personnel should meet the guidelines of Regulatory Guide 1.149. Additional information regarding evaluating simulation facilities is given in NUREG-1278.[37]

3. Formal segments of the initial training program should be substantially completed when the preoperational test program begins, with the exception of a brief, formal refresher just prior to operator examinations.

4. The number of persons for whom training is planned in preparation for senior operator and operator examinations prior to criticality should be sufficient to ~~assure~~ ensure that applicable technical specification conditions with respect to the number of licensed operators on shift crews can be met from the time of initial fuel loading of the first unit, with due allowance given for examination contingencies and the need to avoid planned overtime for supervisory personnel during the startup phase in order to meet technical specification conditions.

5. The licensed operator requalification training program should adequately implement the requirements of 10 CFR ~~Part 55, Appendix A~~ 55.59[38] and Letter from H. R. Denton, NRC, to All Power Reactor Applicants and Licensees, dated March 28, 1980.

Technical Rationale[39]

The technical rationale for application of these acceptance criteria to reviewing licensed operator training is discussed in the following paragraphs:[40]

1. Compliance with the relevant requirements of 10 CFR 50.54 items i through m requires the licensee to have licensed operators or senior operators present at the controls and responsible for manipulation of the controls or directing the licensed activities of other licensed operators, as appropriate.

   The reactor operator and senior reactor operator training programs, including initial and requalification training, established by the applicant provides the means to train individuals in the knowledge, skills, and abilities needed to perform licensed operator duties.

   Meeting these requirements provides assurance that only trained and qualified individuals will be licensed and assigned to carry out or direct operational activities, including manipulation of the controls and other activities affecting reactivity or power level.[41]

2. Compliance with the relevant requirements of 10 CFR 55.41, 55.43, 55.45, and 55.59 requires that the applicant for an operator's license and for requalification successfully complete written and operating examinations, which demonstrates that the applicant possesses the knowledge, skills, and abilities needed to perform licensed activities.

   The reactor operator and senior reactor operator training programs, including initial and requalification training, established by the applicant provides the means to train individuals in the knowledge, skills, and abilities needed to perform licensed operator duties.

   Meeting these requirements provides assurance that only trained and qualified licensed individuals possessing the required knowledge, skills, and abilities will be assigned to, and conduct, licensed activities.[42]

III. REVIEW PROCEDURES

Preparation for the review of Section 13.2.1 of the SAR should include familiarization with 10 CFR ~~Part 50, Section~~ 50.54 items i through m~~,~~; 10 CFR Part 55~~, Sections 55.21, 55.22, 55.23 and Appendix A.~~ particularly 55.41, 55.43, 55.45, and 55.59;[43] 10 CFR 50.34(f)(2)(i)~~,~~;[44] Regulatory Guides 1.8 and 1.149~~,~~; NUREG-0094, "NRC Operator Licensing Guide~~,~~"; ~~NUREG-0718, "Licensing Requirements for Pending Applications for Construction Permits and Manufacturing License,"~~[45] NUREG-0711, "Human Factors Engineering Program Review Model";[46] and NUREG-0737, "Clarification of TMI Action Plan Requirements," including the H. R. Denton March 28, 1980 letter.[47] The reviewer may use training course descriptions obtained independently from vendors. The reviewer should be familiar with the systems approach to training, as defined in 10 CFR 55.4.[48]

The review procedure for this Standard Review Plan (SRP)[49] section consists of:

1. A careful examination of the information submitted to determine that all subject matter identified in subsection I above has been addressed, and

2. A detailed comparison of the information with the acceptance criteria of subsection II above.

The reviewer should ensure that whenever the applicant has committed to follow the position of a regulatory guide, industry standard, or other reference document, the specific revision being referred to is identified. Similarly, whenever the reviewer is using a position in a reference document as a basis for acceptability, the revision being ~~made~~ used should be identified.[50]

The reviewer then determines, based upon the foregoing, the overall acceptability of the applicant's plant staff training plans.

For standard design certification reviews under 10 CFR Part 52, the procedures above should be followed, as modified by the procedures in SRP Section 14.3 (proposed), to verify that the design set forth in the standard safety analysis report, including inspections, tests, analysis, and acceptance criteria (ITAAC), site interface requirements and combined license action items, meet the acceptance criteria given in subsection II. SRP Section 14.3 (proposed) contains procedures for the review of certified design material (CDM) for the standard design, including the site parameters, interface criteria, and ITAAC.[51]

IV. EVALUATION FINDINGS

The reviewer should verify that the information presented ~~and his~~ in the review supports[52] an evaluation findings statement of the following type, to be used in the staff's safety evaluation report.

The staff concludes that the training for reactor operators and senior reactor operators is acceptable and meets the requirements of 10 CFR ~~Part 50, K~~50.54[53] (i through m) and 10 CFR ~~Part 55, KK55.21 through 55.23, and Appendix A~~55.41, 55.43, 55.45, and 55.59.[54]
This conclusion is based on the following:

For Construction Permit or Standard Design Certification[55]

The overall conduct and administration of the plant training program is the responsibility of the Plant Manager. The Training Coordinator, reporting to the Plant Manager, is responsible for development, implementation, and documentation of the training program.

The applicant states that a training program will be established to provide plant personnel with sufficient knowledge and operating experience to start up, operate, and maintain the plant in a safe and efficient manner. The training program, derived from a systems approach to training,[56] is to be developed by the applicant with principal assistance from the vendor training staff. Training for the personnel to be licensed will meet the guidance of Regulatory Guide 1.8 and

include Basic Nuclear Training, Research Reactor Training and Operation, Practical Reactor Operation at an operating PWR or BWR, a Plant System lecture series, Simulator Training, and practical on-the-job training and TMI Action Plan items ~~I.A.4.2 and~~ II.B.4 of ~~NUREG-0718~~ NUREG-0737.[57] Reactor operators will also receive training in security emergency plans, administrative procedures, and radiation protection, as appropriate. Simulators used for training the personnel to be licensed should meet the guidance of Regulatory Guide 1.149.

The information submitted relative to these subjects is satisfactory at the construction permit stage of review, for the preoperational test program, for operator licensing, and for fuel loading.

For Operating License or Combined License[58]

The overall conduct and administration of the plant training program is the responsibility of the Plant Superintendent. ~~He~~ The Plant Superintendent[59] may designate the training supervisor to be responsible for administering the training program and monitoring the program effectiveness. The applicant states that the training program will provide reasonable assurance that decisions and actions by reactor operators and senior reactor operators during all plant conditions will be made consistent with plant safety procedures and operational limits established to protect the public health and safety. The program for formal education and training of the reactor operator has been designated to meet the individual needs of the participants, depending upon their backgrounds, previous training and expected job assignment. The program will meet the guidelines of Regulatory Guide 1.8 and meet the requirements set forth in ANSI N18.1-1971,[60] 10 CFR Part 55, and item I.A.2.1~~, I.A.3.3~~[61] ~~and I.A.3.1~~[62] of the TMI Action Plan of NUREG-0737. Simulators used in the training program should meet the requirements of 10 CFR 55.45(b) and 10 CFR 50.34(f)(2)(1) and[63] the guidelines of Regulatory Guide 1.149. Over ____ candidates will have completed the entire training program prior to the fuel loading so that a sufficient number of licensed operators should be available to meet the technical specification requirements.

The training program for personnel who will be licensed consists of the following discrete segments: Courses in Nuclear Power Plant Steam and Mechanical Fundamentals, Power Plant Electrical Fundamentals and Mathematics and General Physics Review, PWR or BWR Technology, System Description, Heat Transfer, Fluid Flow and Thermodynamics, Mitigating Core Damage, Reactor System Simulator Training, Research Reactor Training, and Refresher Training.

Plans for requalification and replacement training conform to the requirements of 10 CFR Part 50, ~~Appendix A of 10 CFR Part 55~~ 10 CFR 55.59[64] and follow the guidance given in ANSI N18.1 - 1971.[65] In addition, applicants' requalification and replacement training conform to the requirements outlined in a letter from H. R. Denton, NRC, to All Power Reactor Applicants and Licensees, dated March 1980.

For design certification reviews, the findings will also summarize, to the extent that the review is not discussed in other safety evaluation report sections, the staff's evaluation of inspections, tests, analyses, and acceptance criteria (ITAAC), including design acceptance criteria (DAC), site interface requirements, and combined license action items that are relevant to this SRP section.[66]

V. IMPLEMENTATION

The following is intended to provide guidance to applicants and licensees regarding the NRC staff's plans for using this SRP section.

This SRP section will be used by the staff when performing safety evaluations of license applications submitted by applicants pursuant to 10 CFR 50 or 10 CFR 52.[67] Except in those cases in which the applicant proposes an acceptable alternative method for complying with specified portions of the Commission's regulations, the method described herein will be used by the staff in its evaluation of conformance with Commission regulations.

The provisions of this SRP section apply to reviews of applications docketed six months or more after the date of issuance of this SRP section.[68]

VI. REFERENCES[69]

1. 10 CFR Part 50, "Licensing of Production and Utilization Facilities."

2. 10 CFR Part 55, "Operators' Licenses."

3. Regulatory Guide 1.8, "Personnel Selection and Training."

~~10~~4. Regulatory Guide 1.149, "Nuclear Power Plant Simulator for use in Operator Training."

~~4~~5. NUREG-0094, "NRC Operator Licensing Guide," July 1976.

~~5. "Utility Staffing and Training for Nuclear Power," WASH-1130, USAEC, revised June 1973.~~

6. NUREG-0711, "Human Factors Engineering Program Review Model," July 1994.

~~6~~7. NUREG-0737, "Clarification of TMI Action Plan Requirements."

8. NUREG-1278, "Evaluation Procedure for Simulation Facilities Certified Under 10 CFR 55."

~~7~~9. Letter from H. R. Denton, NRC, to All Power Reactor Applicants and Licensees, dated March 28, 1980 (in NUREG-0737).

~~8. NUREG-0718, "Licensing Requirements for Pending Applications for Construction Permits and Manufacturing License."~~

~~9. ANSI/ANS 3.1-1978, "American National Standards for Selection and Training of Nuclear Power Plant Personnel."~~[70]

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SRP Draft Section 13.2.1
Attachment A - Proposed Changes in Order of Occurrence

Item numbers in the following table correspond to superscript numbers in the redline/strikeout copy of the draft SRP section.

Item	Source	Description
1.	Current primary review branch abbreviation	Changed OLB to HHFB.
2.	Editorial modification	Changed "his" to "the."
3.	Integrated Impact No. 1022	Deleted reference to I.A.2.3.
4.	Integrated Impact No. 1051	Deleted reference to I.A.3.1.
5.	Integrated Impact No. 952	Included requirement for requalification program.
6.	PRB Comment Resolution	Changed the heading for subsection I.A in accordance with PRB comments.
7.	Integrated Impact No. 952	Updated references to 10 CFR Part 55.
8.	Integrated Impact No. 952	Included requirement for requalification program.
9.	Integrated Impact No. 953	Included requirement for "systems approach to training."
10.	Integrated Impact No. 1025	Added requirements and guidance for providing simulator capability to plants.
11.	SRP-UDP format item	Regulatory Guide 1.149 is currently under revision. This SRP section may be impacted by the revision and should be reviewed for impact when the revised guide is available.
12.	Editorial	Changed "assure" to "ensure" (global change for this section).
13.	Integrated Impact Nos. 1051 and 1025	Deleted reference to I.A.3.1 of NUREG-0737 and I.A.4.2 of NUREG-0718.
14.	PRB Comment Resolution	Revised the sentence in accordance with PRB comments.
15.	PRB Comment Resolution	Deleted the word "operating" to make the sentence more general and expand applicability.
16.	Integrated Impact No. 952	Deleted outdated information attributed to 10 CFR Part 55 and renumbered subsequent paragraphs.
17.	Integrated Impact No. 953	Included requirement for "systems approach to training."
18.	Integrated Impact No. 952	Deleted outdated 10 CFR Part 55 reference.
19.	PRB Comment Resolution	Revise the heading for subsection I.B in accordance with PRB comments.
20.	Integrated Impact No. 952	Updated references to 10 CFR Part 55.

Item	Source	Description
21.	Integrated Impact No. 952	Included requirement for requalification program.
22.	Integrated Impact No. 953	Included requirement for "systems approach to training."
23.	Integrated Impact No. 1025	Added requirement for simulator facility.
24.	Editorial	Corrected typographical error from "II.A.2.1" to "I.A.2.1."
25.	Integrated Impact No. 952	Deleted outdated 10 CFR Part 55 reference and renumbered the paragraph that follows.
26.	Integrated Impact No. 953	Included requirement for "systems approach to training."
27.	Integrated Impact No. 952	Deleted outdated 10 CFR Part 55 reference.
28.	Integrated Impact No. 1022	Deleted reference to I.A.2.3.
29.	Integrated Impact No. 952	Updated references to 10 CFR Part 55.
30.	SRP-UDP format item	Regulatory Guide 1.8 is currently under revision. This SRP section may be impacted by the revision and should be reviewed for impact when the revised guide is available.
31.	Integrated Impact No. 1022	Deleted reference to I.A.2.3.
32.	Integrated Impact No. 1051	Deleted reference to I.A.3.1.
33.	Editorial modification	Added "and" to correct sentence structure.
34.	Integrated Impact No. 1025	Deleted reference to I.A.4.2.
35.	Integrated Impact No. 954	Added requirements related to the use of simulation facilities.
36.	Integrated Impact No. 1360	Added acceptance criterion of NUREG-0711.
37.	Integrated Impact No. 954	Added reference to guidance in NUREG-1278.
38.	Integrated Impact No. 952	Updated references to 10 CFR Part 55.
39.	SRP-UDP format item	Added "Technical Rationale" to ACCEPTANCE CRITERIA.
40.	SRP-UDP format item	Added lead-in sentence for "Technical Rationale."
41.	SRP-UDP format item	Added technical rationale for 10 CFR 50.54 items i through m.
42.	SRP-UDP format item	Added technical rationale for sections of 10 CFR Part 55.
43.	Integrated Impact No. 952	Updated references to 10 CFR Part 55.

Item	Source	Description
44.	Integrated Impact No. 954	Added reference to 10 CFR 50.34(f)(2)(i) related to simulator requirements.
45.	Integrated Impact No. 1025	Deleted reference to NUREG-0718.
46.	Integrated Impact No. 1360	Added reference to NUREG-0711.
47.	Editorial	Added "1980" to referenced letter and repunctuated sentence for specificity and correctness.
48.	Integrated Impact No. 953	Included requirement for "systems approach to training."
49.	Editorial	Defined "SRP" as "Standard Review Plan."
50.	Editorial	Replaced "made" with "used" for clarity.
51.	SRP-UDP Guidance, Implementation of 10 CFR 52	Added standard paragraph to address application of Review Procedures in design certification reviews.
52.	Editorial modification	Modify sentence to delete "his" and improve sentence structure.
53.	Editorial modification	Provided correct citation format for the Code of Federal Regulations (global change for this section).
54.	Integrated Impact No. 952	Updated references to 10 CFR Part 55.
55.	PRB Comment Resolution	Revised the subheadings in the Evaluation Findings in accordance with PRB comments.
56.	Integrated Impact No. 953	Included requirement for "systems approach to training."
57.	Integrated Impact Nos. 1024 and 1025	Deleted reference to I.A.4.2 and corrected citation to II.B.4 of NUREG-0737.
58.	SRP-UDP formate item	Added "and Combined License" to subsection title.
59.	Editorial modification	Changed "He" to "The Plant Superintendent."
60.	Update standard	This standard needs to be updated to the 1993 version if comparison supports update of the citation.
61.	Integrated Impact No. 1023	Deleted reference to I.A.3.3.
62.	Integrated Impact No. 1051	Deleted reference to I.A.3.1.
63.	Integrated Impact No. 954	Included requirements for simulator facilities and capabilities.
64.	Integrated Impact No. 952	Updated references to 10 CFR Part 55.
65.	Update standard	This standard needs to be updated to the 1993 version if comparison supports update of the citation.

Item	Source	Description
66.	SRP-UDP Format Item, Implement 10 CFR 52 Related Changes	To address design certification reviews a new paragraph was added to the end of the Evaluation Findings. This paragraph addresses design certification specific items including ITAAC, DAC, site interface requirements, and combined license action items.
67.	SRP-UDP Guidance, Implementation of 10 CFR 52	Added standard sentence to address application of the SRP section to reviews of applications filed under 10 CFR Part 52, as well as Part 50.
68.	SRP-UDP Guidance	Added standard paragraph to indicate applicability of this section to reviews of future applications.
69.	Editorial modification	Revised REFERENCES section to delete references not cited, add new references, and modify existing references to appropriate format.
70.	PRB Comment Resolution	The reference to ANSI/ANS 3.1 is deleted. The standard is not cited within the text of the SRP section. In addition, Regulatory Guide 1.8, which is cited as Acceptance Criteria endorses a later version (i.e., 1981). Based on citation of the Regulatory Guide, there is no reason to also cite the standard.

Integrated Impact No.	Issue	SRP Subsections Affected
680	Update standard	Not updated. No staff position to support changes.
952	Update Section 13.2.1 to reflect current 10 CFR Part 55 requirements addressing reactor operator training. Update all 10 CFR Part 55 citations.	Section I, AREAS OF REVIEW, Paragraphs A.1, A.~~4~~, A4, and B.1 Section II, ACCEPTANCE CRITERIA, Paragraphs 1.b and 5 Section III, REVIEW PROCEDURES, First paragraph Section IV, EVALUATION FINDINGS, Second and last paragraphs
953	Revise section to address requirement of 10 CFR 50.120 to have a training program derived from a systems approach to training.	Section I, AREAS OF REVIEW, Paragraphs a.1 and 4 Section III, REVIEW PROCEDURES, First paragraph Section IV, EVALUATION FINDINGS, Second paragraph
954	Add requirements for the use of simulation facility in operating tests.	Section II, ACCEPTANCE CRITERIA, Paragraphs 1.f and 2 Section III, REVIEW PROCEDURES, First paragraph Section IV, EVALUATION FINDINGS, First paragraph Section VI, REFERENCES,

SRP Draft Section 13.2.1
Attachment B - Cross Reference of Integrated Impacts

Integrated Impact No.	Issue	SRP Subsections Affected
1022	Delete citations of NUREG-0737 TMI Action Plan item I.A.2.3.	Section I, AREAS OF REVIEW, First and last paragraphs Section II, ACCEPTANCE CRITERIA Item 1.e Section VI, REFERENCES, References 5 and 6
1023	Delete citations of NUREG-0737 TMI Action Plan item I.A.3.3.	Section IV, EVALUATION FINDINGS, First paragraph
1024	Revise incorrect citation.	Section IV, EVALUATION FINDINGS, Second paragraph
1025	Revise section to address current requirements related to plant simulators and requalification. Delete citations of NUREG-0737 TMI Action Plan item I.A.3.1.	Section I, AREAS OF REVIEW, Paragraphs A.2 and B.2 Section II, ACCEPTANCE CRITERIA, Paragraph 1.e Section III, REVIEW PROCEDURES, First paragraph Section IV, EVALUATION FINDINGS. Second paragraph
1051	Revise section to address current requirements related to TMI Action Plan item I.A.3.1. Determine whether or not to retain the existing citation of I.A.3.1.	Section I, AREAS OF REVIEW, First paragraph and A.2 Section II, ACCEPTANCE CRITERIA, Paragraph 1.e Section IV, EVALUATION FINDINGS, First paragraph

SRP Draft Section 13.2.1
Attachment B - Cross Reference of Integrated Impacts

Integrated Impact No.	Issue	SRP Subsections Affected
1360	Consider incorporating relevant review considerations from NUREG-0711, particularly considerations from Element 9, Training Program Development, into SRP Section 13.2.1.	ACCEPTANCE CRITERIA, paragraph II.1.g REVIEW PROCEDURES REFERENCES