

# PUBLIC SUBMISSION

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NRC Form 396, Certification of Medical Examination by Facility Licensee

**Comment On:** NRC-2025-0011-0001

Information Collection: NRC Form 396, Certification of Medical Examination by Facility Licensee

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## General Comment

The proposed information is not necessary for the NRC to properly perform its functions. The Licensed Operator Requalification Program Inspection biennially reviews the maintenance of operator licenses, including a review of licensed operator performance during requalification exams and operator license restrictions. The ANSI/ANS 3.4 and 15.4 standards clearly define medical restrictions.

Implementing any of the following would minimize burden:

- Reviewing medical restrictions coincident with the 71111.11 inspection versus submitting individual medical status changes on a NRC Form 396.
- If a medical restriction already exists, there is no need to submit a NRC Form 396 with modified information. For example, if a licensed operator already has a restriction of shall take medication as prescribed for blood pressure and is adding a new medication for shall take medication as prescribed for another condition, a NRC Form 396 submittal should not be required as the license restriction already exists.
- Eliminating signatures on the NRC Form 396. The utility could streamline reviews per internal processes and utilize electronic reviews versus (in some cases) hard copy circulation for signatures.
- Eliminating information only submittals. If these truly are for informational purposes, they are not necessary for the NRC to perform its function.
- Changing the reporting frequency of required medical updates. Utility processes require controls for medical status changes. These changes are auditable at any time by the NRC/NRC residents. Reducing the frequency of required submittals reduces the administrative burden associated with NRC submittals.

Regarding quality/clarity:

- Box 10 instructions need additional clarity. Is the intent of this Box to indicate a different restriction (e.g. a licensed operator now requires restriction of solo operation is not authorized where previously they did not) or is the intent of this Box to indicate a change in restriction (e.g. a licensed operator used to require a restriction of shall take medication as prescribed for Condition A and now requires a restriction

of shall take medication as prescribed for Condition B (two different medical conditions) or e.g. a licensed operator requires a restriction of shall take medication as prescribed for Condition A and takes Medication A. The licensed operator now requires a restriction of shall take medication as prescribed for Condition A and takes Medication B (same medical condition, different medication)).

- Recommend combining “Proposed Wording of Restriction” and “Relationship of Restriction to Disqualifying Condition” Boxes as these two boxes are only used when Box 9 is checked.
- Recommend moving “Explanations” Box above “Proposed Wording of Restriction” and “Relationship of Restriction to Disqualifying Condition” Boxes. Explanations Box is used much more frequently
- Clarify intent of Box 12. Supporting information (Medical Evidence) is provided for restriction changes. Instructions indicate this is for new applicants.