**ANS Issues a Response to an Inquiry on ANS-3.1-1978 (withdrawn), *Selection and Training of Nuclear Power Plant Personnel***

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The ANS Standards Committee received an inquiry on ANS-3.1-1978 (withdrawn). The inquiry and response are provided below. Some editorial changes have been made for clarity.

***Inquiry:***

Entergy seeks clarification on the requirements of individuals fulfilling reactor engineering supervisory duties as described in ANS-3.1-1978 (withdrawn), *Selection and Training of Nuclear Power Plant Personnel*. Specifically,

1. For Section 3.1, paragraph 2, does this section only apply to “personnel temporarily filling positions due to absences of the principal” or can it also be applied to personnel permanently filling a position to which not all applicable requirements in ANS-3.1-1978 are yet met?
2. For Section 4.4, what is the definition of “group leaders”? Can the group leader be someone other than the supervisor of the reactor engineering group (for instance, a fully qualified and proficient senior reactor engineer or staff engineer or the supervisor’s direct manager)?
3. For Sections 5.3.2 and 5.3.3, can a supervisor working toward meeting the requirements be in role as a supervisor of a group leader as defined in the inquiry for Section 4.4 is available?

***Detailed Response:***

It is important to note when responding to this inquiry that ANS-3.1-1978, *Selection and Training of Nuclear Power Plant Personnel*, Section 1, “Scope,” states, in part, “Individual job titles and organizational structures vary among organizations operating power reactors; therefore, this standard is predicated on levels of responsibility rather than on a particular organizational concept.”

1. **Section 3.1, paragraph 2, states, in part, “Personnel temporarily filling positions due to absences of the principal may not meet the literal requirements of this standard. Use of personnel to fill a position for which they do not meet the minimum requirements set forth in this standard is permissible on a justifiable basis ordinarily not to exceed three months but shall not be used as a means of reducing the level of minimum qualifications which the following paragraphs establish as being acceptable.”**

When evaluating, “does this section only apply to ‘personnel temporarily filling positions due to absences of the principal’ or can it also be applied to personnel permanently filling a position to which not all applicable requirements . . . are yet met?,” the owner organization needs to identify the principal position that is required and absent and provide justifiable basis for using personnel that do not meet the minimum requirements of that position to temporarily fill the position. Ordinarily this would not exceed three months. It shall not be used as a means of reducing the level of minimum qualifications for the positions described in this standard.

Regarding whether these requirements can be applied to personnel permanently filling a position to which not all applicable requirements are yet met, the owner organization would need to ensure the requirements of Section 3.1, paragraph 2, are met.

1. **Section 4.4, “Professional-Technical,” describes, “the on-site professional-technical groups shall include individuals (group leaders) with the following qualifications in the indicated disciplines. A single individual may be qualified and perform in more than one discipline. Suitable organizational depth shall exist to provide for an absence of the principal.”**

**Section 4.4.1, “Reactor Engineering,” describes the requirements of the “responsible person.”**

When evaluating, “what is the definition of ‘group leaders’?,” Section 3.2.3 describes functional levels of assignments of responsibility for Professional-Technical personnel as those responsible for supervising and performing certain technical services in support of plant operations. Section 4.4 describes group leaders as individuals with the following qualifications in the indicated disciplines. Section 4.4.1 describes those requirements for reactor engineering.

Regarding “Can the group leader be someone other than the supervisor of the reactor engineering group (for instance, a fully qualified and proficient senior reactor engineer or staff engineer or the supervisor’s direct manager)?,” recall the standard recognizes that “Individual job titles and organizational structures vary among organizations operating power reactors; therefore, this standard is predicated on levels of responsibility rather than on a particular organizational concept”;therefore, the owner organization defines the positions that meet the functional levels of responsibilities and would not be limited to specific titles.

1. The working group reached out to Entergy regarding their inquiry and understands that a response to Question 3 is no longer necessary. If this is not the case, clarification is needed to respond to Question 3. Specifically, is the question referring to a supervisor “meeting the requirements”? What requirements are being referenced? Is it the requirements to be a supervisor of a group leader? If so, is the word “to” prior to the phrase “be in a role” missing? If the word “to” is not missing, is the question whether an individual can serve as a supervisor prior to meeting some unspecified requirements? If so, those requirements should be stated.

***Short Response:***

When considering the inquiry for clarification on the requirements of individuals fulfilling reactor engineering supervisory duties as described in ANS-3.1-1978, *Selection and Training of Nuclear Power Plant Personnel*, the following questions should be considered.

1. Do the personnel permanently filling a position to which not all applicable requirements are yet met meet the requirements of Section 3.1, paragraph 2?

If the answer is yes, it is reasonable to conclude that personnel are temporarily filling a position due to the absence of the principal.

1. Does the person(s) filling the role of group leader meet the responsible person requirements of Section 4.4.1?

If the answer is yes, it is reasonable to conclude that the functional level of responsibilities described in this standard is met.

Responses issued to inquiries on ANS standards are published in ANS’s magazine, *Nuclear News*, and are available on the ANS website on the [Responses to Inquiries webpage](https://www.ans.org/standards/inquiryresponses/). Individuals wishing to submit an inquiry on an ANS standard are asked to provide a completed [inquiry submittal form](https://www.ans.org/standards/docs/inquiry-submittal-form.pdf) to standards@ans.org.