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Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. Stephen S. Hanauer, Director
Division of Human Factors Safety

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Comments on NUREG/CR-1750
Analysis, Conclusions, and Recommendations
Concerning Operator Licensing



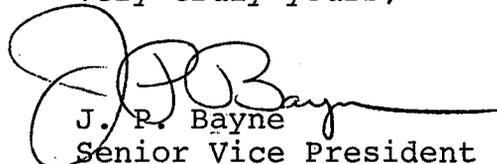
Dear Sir:

The Authority has reviewed NUREG/CR-1750, "Analysis, Conclusions, and Recommendations Concerning Operator Licensing" and would like to take this opportunity to offer our comments to the Commission on this report.

Because of the length of NUREG/CR-1750, the Power Authority has not yet completed it's review of the main body of the report. The comments on the attached sheets therefore are limited to the Executive Summary portion of the report.

If you have any questions regarding these comments, we would be glad to discuss them further with you.

Very truly yours,


J. P. Bayne

Senior Vice President
Nuclear Generation

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I. License Training

"Simulator training programs are generally too short to permit training in all the required skills and knowledges which, by necessity, must be taught during simulator training. These programs rely on a specified number of hours on the simulator rather than training to a predetermined level of proficiency. The NRC should establish minimum time requirements for simulator programs based on the training objectives required to be accomplished during simulator training and the operational experience of candidates." (Executive Summary page 5, fourth paragraph)

COMMENT:

Evaluating a "given level of proficiency" is currently done through simulator instructors. Since this is done subjectively, without generally accepted evaluation criteria, the evaluations currently provide little assurance that the operators have attained, or are maintaining, a satisfactory level of proficiency.

RECOMMENDATION:

Rather than mandating minimum time requirements for simulator programs as evaluation criteria should be developed to provide uniform evaluations by simulator instructors. In addition, computer programs to reduce the degree of subjectivity should be developed for all existing and planned simulators.

II. Selection, Screening and Certification

"A high school diploma (or equivalent) provides adequate background education for acquiring RO-level skills and knowledges. SROs, however, require some college-level instruction in related technical subjects due to their increased responsibilities and involvement in decision-making problem-solving and analysis processes. A college degree in engineering or other related field is not a necessary requirement for the Shift Supervisor position." (Executive Summary page 7, second paragraph)

COMMENT:

The Authority agrees that a college degree should not be required for Shift Supervisors. The 60-credit program currently being considered by the NRC should adequately satisfy this recommendation calling for "some college-level instruction in related technical subjects".

"Facilities should be required to establish formal methods for certifying satisfactory knowledge and performance for each applicable phase of their training programs and make records of trainee performance available to OLB examiners. The practice would identify potential areas of weakness and permit OLB examiners to probe these areas to ensure adequate knowledge before licensing." (Executive Summary page 7, third paragraph)

COMMENT:

The industry will not be well served by directing the OLB examiner's attention to any previously-identified area of weakness since remedial action in these areas can be expected. This could contribute to examiners over emphasizing weak areas during examinations resulting in nonrepresentative results since the candidate could be expected to "cram" in these areas. The overall goal should be thorough examinations and well-qualified operators.

"Utility corporate management personnel currently required to sign certifications of license candidates' competence should activity participate in the certification process. This certification should consider personal character issues beyond those of technical competence and training received. Interviews should be conducted to assess the candidates' appreciation of reactor safety responsibilities and their obligations to the utility and the general public." (Executive Summary page 7, fourth paragraph)

COMMENT:

This would increase the involvement of Senior Managerial personnel and could distract the overall management and control activities deemed important to safety and actually degrade safety. A brief interview, conducted by the Headquarters Training Manager in the final stages of the certification process would be sufficient.