

D890615

The Honorable Lando W. Zech, Jr.
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Zech:

SUBJECT: PROPOSED COMMISSION POLICY STATEMENT ON EDUCATION FOR SENIOR OPERATORS AND SHIFT SUPERVISORS AT NUCLEAR POWER PLANTS

During the 350th meeting of the Advisory Committee on Reactor Safeguards, June 8-10, 1989, we discussed the proposed Commission Policy Statement on Education for Senior Operators and Shift Supervisors at Nuclear Power Plants. Our Subcommittee on Human Factors met with the NRC staff on June 7, 1989 to discuss the proposed policy statement. We previously commented on this general matter in a report to you dated August 12, 1987 entitled, "ACRS Comments on the Advance Notice of Proposed Rulemaking: Degree Requirements for Senior Operators."

We endorse the proposal to issue a policy statement that presents the Commission's views concerning education for senior operators and shift supervisors, in contrast to promulgating a rule that would mandate that either all senior operators or all shift supervisors possess a baccalaureate degree. This matter, under discussion for nearly a decade, has created considerable concern among licensee personnel, and thus should be resolved. As indicated in our previous report, we strongly support the concept of having engineering expertise on each shift. Further, we endorse the goals of enhancing professionalism in plant operations, and we believe that this will provide a cadre of individuals with plant operating experience who would be available for promotion to higher management positions. However, we do not think that requiring all senior operators to have degrees is the best approach to achieving these goals.

We believe the policy statement should indicate more clearly that it is not the Commission's intent that all senior operators and shift supervisors have a degree but that it intends to encourage licensee management to employ individuals with a mix of education, training, and experience in plant operations. Further, some of these individuals should hold degrees or be seeking degrees.

We do not believe that it is feasible for all licensees to hire college graduates into entry level positions on the operating staff, if entry level means auxiliary or nonlicensed operators. Therefore, we suggest that the first sentence of the fifth paragraph of the proposed policy statement provided to us read as follows:

Additionally, the Commission encourages nuclear plant licensees to hire college graduates for positions on the operating staff at levels consistent with the employment practices of the licensee.

In response to Commissioner Roberts' request, we have specifically addressed the question of encouraging degrees from accredited institutions as stated in

the proposed policy statement. Design, construction, operation, and regulation of complex, highly technical facilities, such as nuclear power plants, require competent individuals with quality education and training. Hiring an employee with a degree from an accredited program or institution is not a guarantee of such competence and education. However, accreditation has been developed through the years by academic institutions and professional organizations to provide some assurance that certain standards of quality are maintained among educational institutions. Therefore, we endorse the Commission's encouragement to licensees to attract individuals with science or engineering degrees from accredited institutions to operating staff positions in their plants, and in particular to encourage the recruitment of graduates with engineering or engineering technology degrees from accredited programs.

Although we believe the policy statement could be written more concisely, we recommend that the Commission issue the proposed policy statement as an expression of its general views on education for senior operators and shift supervisors.

Additional comments by ACRS members William Kerr, Harold W. Lewis, Chester P. Siess, and David A. Ward are presented below.

Sincerely,

Forrest J. Remick
Chairman

Additional Comments by ACRS Member William Kerr

This proposed policy statement appears to have evolved from an earlier proposed rule. The evolution is not mature. It retains material irrelevant to a policy statement, is unfocused, incoherent, and, occasionally, inconsistent. If a policy statement is to be issued, it should be shortened and its focus should be sharpened.

Further, I am concerned that this policy statement appears to be encroaching on prerogatives and responsibilities of utility management. While some of the suggestions may be appropriate to some utilities, there may well be alternatives that are as good or better. These should be identified and implemented by responsible management.

Additional Comments by ACRS Member Harold W. Lewis

I believe that this is a classic example of a case in which the best action by the Commission would be no action at all. The primary rationale for the policy statement is that something needs to be said, now that the decision has been made not to issue a rule. The Commission could say that INPO has written a fine statement on professionalism, and it is pleased.

As the Committee has said earlier, there is no known connection between a degree and professionalism, and surely the intent is to get the best available people into the nuclear business. Arbitrary limitations on the supply of candidates are bound to be counterproductive.

The same is true of managers' need for operating experience. It is obvious that management is best among those who understand what they are managing. It is far from clear that this understanding is best acquired by serving as an operator.

The pool of qualified people in all these categories is limited. I see no need to put ill-conceived restrictions on the acquisition process. Every person chosen for (or promoted to) any job in the nuclear business should be the best person available for the job at that time, and incentives should then be provided for further self-improvement. That is what is meant by encouraging professionalism.

Additional Comments by ACRS Member Chester P. Siess

The staff's attempt to translate a proposed rule into a policy statement and to accommodate the varying views of the Commissioners has led to an unfocused statement that is unlikely to send a clear message to the public, the Congress, or the industry. I do not believe that a policy statement is needed to tell the industry that nuclear power plants should be operated and managed by competent and dedicated people. Nor do I agree that a college degree is either necessary or sufficient to provide people with those attributes.

Additional Comments by ACRS Member David A. Ward

I believe the proposed policy statement should not be issued. While some of the goals of the policy are laudable, they have not been clearly thought out. Most important, it is not evident that the policy statement is necessary or will be instrumental in achieving the goals. It might very well be counter-productive. This is a matter best left to INPO which is moving effectively in this area.

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