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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 THE PROFESSIONAL CONDUCT OF
NUCLEAR POWER PLANT OPERATORS (SECY-88-57)

During the 337th meeting of the Advisory Committee on Reactor Safeguards, May 5-7, 1988, we discussed the Proposed Commission Policy Statement on the Professional Conduct of Nuclear Power Plant Operators. This matter was reviewed by the Human Factors Subcommittee on April 27, 1988 with the NRC Staff, and at this same meeting related industry initiatives were discussed with representatives of the Nuclear Management and Resources Council (NUMARC) and the Institute of Nuclear Power Operations (INPO). We also had the benefit of the documents referenced.

Based on our discussions and review, we recommend that the Commission not issue the proposed policy statement for public comment. We make this recommendation for two reasons: (1) the proposed policy statement and associated supplementary information have not been adequately developed; and (2) issuance at this time could be counterproductive to a more comprehensive effort under way by industry. Instead, we recommend that, at least for the present time, the NRC monitor the broader and more comprehensive industry effort and defer the decision on the need for such a policy statement until a later time.

We provide the following elaboration of these two reasons for our recommendation:

Inadequate Development: The proposed policy statement has not been developed to the stage that it is ready for issuance. In contrast to being a broad statement of policy suitable for Commission issuance, it is a list of limited prescriptive do's and don'ts suitable, at most, for inclusion in a lower-level document. Further, one can conclude that complying with the list of proposed do's and don'ts would constitute an adequate standard of professional conduct for operators. We do not consider this to be the case.

Confusion and inconsistencies exist among the policy statement, the associated SECY document, and the enclosed supplementary information on such matters as to which operating personnel (i.e., licensed? unlicensed? both?) the policy applies. The document is replete with all-inclusive statements, such as: "... should have knowledge of all aspects of plant status"; "... should be alert to prevent and mitigate any operational problems"; "All on-duty operators at all times must be alert;" "The operator's attention must be given to the condition of the plant at all times"; "All of the operator's senses must be focused on carrying out..." [emphasis added]. Such expectations are unrealistic when dealing with humans.

The proposed policy statement also addresses the matter of unauthorized individuals being allowed to manipulate controls. This matter is quite clearly covered in the Commission's regulations [e.g., 10 CFR 50.54(h) and (i) and 10 CFR 55.13]; therefore, it should not be included in a proposed policy statement on professional conduct.

Further, the proposed policy statement indicates that licensees should discourage the use of electronic entertainment devices such as radios and tape players. The NRC Staff has not been able to show that the use of such devices necessarily is disruptive of professional conduct and poses a public health and safety problem. The accompanying SECY paper indicates that licensees either must provide assurance that the use of electronic entertainment equipment in the control room maintains or enhances operator performance, or must prohibit the use of such equipment. In contrast to expecting licensees to prove the unprovable, we think that licensees should be asked to ensure that, if such devices are permitted in control rooms, they do not interfere with normal control room operations.

Counterproductive to Industry Effort: Representatives of NUMARC and INPO briefed the Human Factors Subcommittee on two related industry efforts. These are the top-down effort to develop management Principles for Enhancing Professionalism of Nuclear Personnel and the bottom-up effort to develop a Professional Code for Operators. The first effort is to establish principles by which management can provide an environment in nuclear power plants that is conducive to excellence and professionalism. This effort includes principles for corporate management and will include not only principles for managing operations personnel but also principles for managing maintenance, technical, and engineering personnel. The bottom-up effort encourages every nuclear utility to assist its operators in developing a professional code for operators (both licensed and unlicensed). Documents entitled, "Key Elements of Professional Code for Operators" and "Suggestions for Developing and Implementing a Code" have been distributed to all utilities. These were developed by a select group of Senior Reactor Operators from each utility. INPO has asked each member utility to have its professional code for operators in place and in use by July 1988.

The proposed policy statement is much less comprehensive than the industry effort to establish a professional code and will lack the pride of authorship of those who must utilize it. Issuance of the policy statement at this time would be counterproductive because some utilities may await issuance of the impending policy statement in contrast to participating fully in the industry-wide effort. We think this would be unfortunate.

For these reasons, we recommend that the Commission not issue the proposed policy statement for public comment. Instead, we recommend that the Commission encourage the industry effort and monitor its effectiveness following implementation.

Sincerely,

W. Kerr
Chairman

References:

1. SECY-88-57 dated February 29, 1988, for the Commissioners from V. Stello, Executive Director for Operations, NRC, Subject: Proposed Commission Policy Statement on the Professional Conduct of Nuclear Power Plant Operators, with enclosures (ACRS Internal Use Only).
2. Letter dated March 14, 1988 from Zack T. Pate, President, INPO, to R. Patrick McDonald, Senior Vice President, Alabama Power Company, regarding development of professional codes for operators.
3. Letter dated March 30, 1988 from Zack T. Pate, President, INPO, to Joseph M. Farley, President, Alabama Power Company, regarding the development and adoption of a set of management principles to enhance professionalism.

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