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DENTON, H. R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Submits comments & suggestions pertinent to NUREG-0731, "Guidelines for Util Mgt Structure & Techinical Resources," NUREG-1280, "Power Plant Staffing," & NUREG/CR-1656, "Util Mgt & Technical Resources," before finalization.

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ATTORNEYS

December 8, 1980

Mr. Harold R. Denton
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

In response to the invitation that appeared in the Federal Register (October 7, 1980, Volume 45, No. 196, pages 66538 and 66539), the Pacific Gas and Electric Company is taking this opportunity to submit written comments and suggestions pertinent to the "Guidelines for Utility Management Structure and Technical Resources" - NUREG-0731.

In addition to NUREG-0731, these comments also apply to NUREG/CR-1280, "Power Plant Staffing," and NUREG/CR-1656, "Utility Management and Technical Resources." The comment period as noticed in the Federal Register for the latter NUREG expires on December 8, 1980. An extension of the comment period for the other NUREGs was granted to December 8, 1980 following a request by the Westinghouse Owners Group.

We strongly recommend that the staff consider the following comments prior to any further action related to finalizing these NUREGs. Should the staff desire, we would be pleased to further discuss our comments and suggestions at your convenience.

ROUTINE OPERATIONS

- Personnel Qualification Criteria

  The personnel of an operating organization who have the responsibility for the safe and efficient operation of a nuclear power plant throughout its operational lifetime must understand the complexities of the plant design. In addition, they must be capable of properly manipulating the plant controls and maintaining and repairing the plant equipment. Furthermore, the selection of the operating and support personnel for nuclear power plants and the training of these personnel to provide

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sound judgement are essential for safe and successful operation of these plants. This judgement must be based on a thorough knowledge and experience of nuclear and power plant systems.

Many persons involved in designing, constructing and operating nuclear power plants are uniquely qualified to hold positions in a nuclear power generating organization. This qualification can be based more on their extensive experience within the industry rather than their formal education. Section 4.1 of ANSI/ANS 3.1 recognizes that some individuals who do not possess the formal educational requirements along the lines of the draft NUREG-0731 are - because of additional experience, training and education - considered to meet equivalent qualifications of a particular position. As such, all of the guidelines in NUREG-0731 for personnel qualifications should be written considering Section 4.1 of ANSI/ANS 3.1 or the first sentence of Section II.B.2.c.(4) of NUREG-0731.

- Acceptance Criteria

Most of the nuclear industry has staffs at their operating power plants or NTOLs that were established and trained prior to the issuance of ANSI/ANS 3.1, 3.2 or Reg. Guide 1.8. The Diablo Canyon staff was developed to meet the requirements of ANSI 18.1-1971. NUREG-0731 states that "a reasonable period of time, probably on the order of two years, must be allowed for utilities to make necessary staffing changes and other arrangements." Reasonable acceptance criteria must be promulgated to allow time for utilities to meet the more stringent proposed requirements. Utilities may require substantially more than two years to meet the NUREG-0731 guidelines. Clarification or guidance is needed from the NRC as to what level of compliance is acceptable. Sufficient flexibility in the acceptance criteria must be provided to allow a reasonable, but timely, transition by utilities to meet the more stringent guidelines.

- Independence Within An Operating Organization

Independence from operating pressures for onsite support personnel outside of the operating staff can be assured by several means. Of necessity, the functional areas of radiation protection and training cannot report only to offsite management but must to some degree be functionally integrated within an operating organization. While reporting outside of an operating organization, the independence and integrity of the non-operating personnel can be safeguarded by several review and audit organizations. Examples of these review and audit organizations for Diablo Canyon are the Plant Staff Review Committee, Onsite Safety Review Group, Nuclear Power Generation Management Oversight Group, Quality Assurance Department, the General Office Nuclear Plant Review and Audit Committee and the President's Nuclear Advisory Committee.

- Implications of Overly Prescriptive Requirements

Requirements for administrative procedures must not be overly prescriptive. For example, the overtime work policy for licensed shift personnel must not be so prescriptive as to preclude requirements in labor contracts with unions. Even if flexibility concerning overtime work is given to the plant manager, labor contract requirements may preclude compliance, and subsequent labor negotiations may be unduly restricted.

Tables 2 and 3 of NUREG-0731 delineate specific years of experience and qualifications for offsite technical personnel While these tables are to "be used as an indication of the caliber of individual that should be available in each area of expertise listed," clarification should be provided in the acceptance criteria as to how these measures will be applied.

Prescriptive requirements must be accurately clarified to provide reasonable flexibility for the utilities to comply.

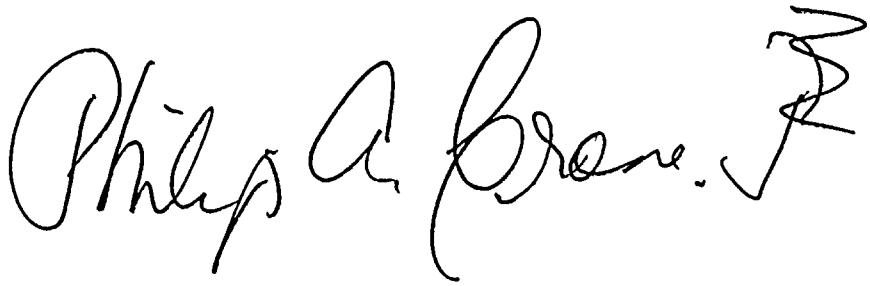
OPERATIONS DURING ACCIDENT CONDITIONS

While the above comments and suggestions generally apply to operations during accident conditions, additional flexibility and clarification is needed.

The requirement to staff the near-term onsite emergency organization within two hours is in conflict with NUREG-0654. The guideline providing for two hours is sufficient for staffing and activating a near-term emergency onsite organization. NUREG-0654 requires staffing and activation within half an hour of the time the shift foreman activates the emergency plan. The NUREG-0654 requirement does not provide sufficient flexibility for remote sites to respond and does not give sufficient credit to the existing capabilities of the operating staff onsite at the time of the accident. The resident operating staff is sufficient to cope with operations during short-term accident conditions. NUREG/CR-1656 concludes the quality, not quantity, of operators is what is important.

The location of the emergency operations facility should be appropriately convenient to not only the NRC and the utility but in addition should reflect the needs of state and local governments, law enforcement agencies and FEMA.

Respectfully submitted,



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