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Qualification and Training of Personnel for Nuclear Power Plants; Draft Regulatory Guide

Comment On: NRC-2018-0023-0001

Qualification and Training of Personnel for Nuclear Power Plants

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General Comment

See attached file(s)

Attachments

DG-1329 comments

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SUNSI Review Complete
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Add= Stephen Burton (5XB3)
James Kellum (JXK3)

Section C.1.1 - It's not clear to me why the NRC does not endorse having individuals not fully meeting the qualifications as a manager if they have staff that do. This could prevent mentoring of a desirable person who doesn't quite have the required years of experience to enable them to take the title of manager. The goal is to have experienced people performing the site functions, whether they have the title of manager or not.

Section C.1.4 - Why the difference in required experience levels between reactors of the same vendor, comparable or non-comparable reactors and military reactors? This is unnecessarily complex.

Section C.1.6 - The benefit of requiring one more year of experience for reactor operators is not clear. Similarly the benefit of the added requirements for non-licensed operator experience is not clear and are unnecessarily complex.