Houston Lighting & Power Company

Electric Tower
P.O. Box 1700
Houston, Texas 77001

PROPOSED RULE PR more notice Regguide

January 28, 1981

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D.C.

Attention: Docketing & Service Branch

Dear Sir:

Comments on
Second Proposed Revision to Regulatory Guide 1.8
and the December 6, 1979 Draft of ANS 3.1

Houston Lighting & Power Company supports the NRC's intent to ensure that nuclear power plants are staffed with able, competent personnel. However, we consider the requirements of the subject regulatory guide and its associated draft standard to be arbitrary and unnecessarily restrictive. These requirements attempt to define particular levels of competency by identifying the events which an individual must experience to be considered "qualified" (i.e. number of years experience, college education, simulator training, etc.).

Compliance with this type of criteria implies competence but does not assure competence. The guide, therefore, does not assure that personnel are competent, but only that they are qualified. In addition, the guide eliminates from consideration those individuals who are competent, but do not possess those qualifications stated in the guide.

The effect of this methodology of determining competence is to eliminate some competent people from responsible positions in the industry, resulting in a net decrease in safety.

Houston Lighting & Power Company recommends that the NRC and INPO develop a methodology to measure competence of personnel filling key positions at operating nuclear plants. This methodology should include various means of testing, as well as observation and evaluation of performance by managers and supervisors.

I urge you to carefuily consider the far-reaching effects of this guide and its ultimate effect on safety.

2/3/81

Yours very truly,

cc: E. P. Wilkinson (INPO)
R. I. Moles

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