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May 8, 1979

DOCKET NUMBER  
PROPOSED RULE PR - Misc. Notice  
Reg. Guide

Secretary of the Commission  
Att Docketing and Service Section  
US Nuclear Regulatory Commission  
Washington, DC 20555

The following comments concerning Regulatory Guide 1.8, Revision 2, "Personnel Selection And Training," are presented for your consideration:

1. The subject Regulatory Guide's purpose is to endorse, with some modification, the guidelines contained in ANSI/ANS 3.1-1978, "Selection and Training of Nuclear Power Plant Personnel." In doing so, however, it intrudes upon ANSI N 45.2.6-1973 and Regulatory Guide 1.58 in expanding its scope to include qualifications for preoperational testing personnel. ANSI/ANS 3.1-1978 is intended to upgrade ANSI N 18.1-1971 to provide for, among other things, qualification of plant operators who participate in preoperational training. Qualifications of preoperational testing personnel are covered in ANSI 45.2.6 and by Regulatory Guide 1.58. To avoid conflicting requirements and the resultant confusion, it is recommended that Regulatory Position C.3 be eliminated or at a minimum be modified to be in agreement with Regulatory Guide 1.58 and ANSI N 45.2.6-1973.
2. Regulatory Position C.2 should be expanded to include four years of operational or technical experience or training at a military, nonstationary, or propulsion nuclear plant as being acceptable in meeting the requirements for "bachelor's degree or equivalent."
3. Regulatory Position C.3.a should be modified to waive the requirement for 3 months of indoctrination/training in a similar facility if personnel have greater than one year nuclear experience.
4. Regulatory Position C.3.c should be rewritten to allow a bachelor's degree or equivalent (as defined by Regulatory Position C.2) plus 4 years experience in lieu of the 8 years experience the Guide currently recommends.

Acknowledged by card... 5/22

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Please consider these comments in future revisions of this Guide.



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