



DOCKET NUMBER

PROPOSED RULE

PR misc. Notice
Reg. Guide

Marvin I. Lewis
6504 Bradford St.
Phila. PA 19149
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Reg 1.58H (RS-9045)

USNRC
SirS:

The entire Regulatory Guide concept has one guiding principle: If you have a reg guide that says you are right, you're clear to do it wrong! This is well demonstrated in the reg guides on employee training and qualification. Instead of worrying whether the employees in question are truly capable of their jobs, the NRC staff substitutes the phrase, "the requirements are included on ANSI N 45.2.6 1978 are acceptable to the NRC staff and provide an adequate basis for complying with pertinent Q/A requirements of App B to 10 CFR 5...". NO where does it say that the employee shall be able to do the job for which he is hired to do! The staff substitutes form (a piece of paper) for substance (the ability to do the job.)

Operator error at TMI#2 on 3/28/79 exacerbates the continuing problem of substituting form for substance at NRC and in the nuclear industry.

I DEMAND that the reg guide be withdrawn and rewritten and follows":

1. A section on what qualification errors were involved on the actions of employees ~~XXXXXXXX~~ at TMI#2 on 3/28/79 and how to avoid repeating said errors.
2. Merely referring to a document and saying its ok is not enough. This gives contractors an excuse to use only those parts of a reference with which they are comfortable. Put those parts of ANSI which are important in this reg guide.
3. Do not depend on industry standards! TMI#@ 2 on 3/28/79 is an industry standard.
4. Senator Schweicker requested a GAO report on Employee training and qualification. Add this GAO report on NRC training to your list of references and make it required reading for whomever writes these stupid reg guides on employee training, qualification and what have you.

Acknowledged by card. *[Signature]*

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