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

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Service Branch

Subject: Proposed Revision 2 to Draft Regulation Guide 1.8
Personnel Selection and Training
Duke Power Company Comments



Reference: Federal Register Notice of May 30, 1979, Page 31051,
Requesting Additional Comments

Dear Sir:

The following are our comments on the proposed revision:

Item 1

Section C.3.a requires that personnel that direct or supervise the conduct of individual Preoperational Tests should have a Bachelors Degree in Engineering or the Physical Sciences or the equivalent and one year of applicable power plant experience. Included in the one year of experience should be at least three months of indoctrination/training in nuclear power systems and component operation in a nuclear power plant that is substantially similar in design to the type at which the individual will perform the function.

It has been our experience that individuals responsible for directing or supervising the conduct of individual Preoperational Tests do not require the broad scope knowledge which seems to be indicated by the requirement to have at least three months training and one year power plant experience. The individuals gain specific knowledge on the system to be tested and are capable of understanding the interaction of that system with others in a much shorter period of time. This requirement would be unreasonable to expect a plant in startup to meet.

Section C.3.a would require that an individual have one year nuclear power

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plant experience with a minimum of three months formal indoctrination training in nuclear power plant systems and component operation in a nuclear power plant that is substantially similar in design to the type at which the individual will perform the function. It is agreed that this level of training and experience would be of benefit to the applicant; however, there is a large cost associated with this formal training. Typically, it has required at least 12 engineers to support the preoperational test program. A large portion of this engineering staff has been recruited from within Duke Power Company from positions which would not be classified as "Nuclear Station Experience." These engineers are capable of performing the supervision of preoperational tests within six months of reporting to a nuclear station. Also, three months specific training on specific nuclear power plant components by an outside NSSS vendor would run in the order of \$100,000. When combined with staffing six months early we would estimate the total impact of this regulatory position to be \$160,000.

Item 2

Section C.3.b requires that individuals that direct or supervise the conduct of individual startup tests have a Bachelors Degree in Engineering or the Physical Sciences or the equivalent and two years of applicable power plant experience at least one year of which should be applicable nuclear power plant experience.

Individuals that direct or supervise the conduct of individual startup tests normally possess a Bachelors Degree in Nuclear Engineering or a related engineering field. This field is quite specialized and the requirement to have two years applicable power plant experience seems to be unreasonable. This requirement would make it mandatory that all startup test engineers be hired two years prior to fuel loading. This is an unreasonable and unrealistic requirement to impose upon a station.

Position C.3.b requires that individuals that direct or supervise the conduct of individual startup tests have a minimum of two years applicable power plant experience and at least one year of nuclear power plant experience. Included in this one year of experience should be at least three months of indoctrination/training in nuclear power plant systems and component operation in a nuclear power plant that is substantially similar in design to the type at which the individual will perform the function. Typically startup testing has required the efforts of four engineers. As in the case above, an individual with six months experience at a station is capable of supervising the conduct of an individual startup test. It is our position that the one year power plant experience not relative to nuclear power plant experience is irrelevant to being able to adequately supervise a startup test. Therefore, the value impact in salaries by having to staff one and a half years early would amount to \$120,000. The cost of training for these individuals would be included under paragraph one above.

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Item 3

Section C.3.c requires that individuals assigned to groups responsible for review and approval of preoperational and startup test procedures and/or review and approval of test results have a minimum of eight years of applicable power plant experience with a minimum of two years applicable nuclear power plant experience.

This requirement is satisfactory for those individuals that approve procedures and test results. It is unreasonable for those individuals required to staff review groups which review procedures. It is recommended that only a Bachelors Degree in Engineering or the Physical Sciences or the equivalent be required for this function.

Section C.2.c requires that individuals assigned to groups responsible for review of preoperational and startup test procedures have a minimum of eight years applicable power plant experience with a minimum of two years applicable nuclear power plant experience. Typically there are very few personnel at a preoperational station which have this level of experience. To require that an individual with this level of experience review all preoperational and startup test procedures places an unreasonable burden upon those individuals. We do agree that an individual with this level of experience be required to approve these procedures. At Catawba Station we require that individuals that review these procedures have a minimum of one year nuclear power plant experience which would result in a considerable salary saving over the requirement as specified in the Regulatory Guide.

Item 4

Section C.5 requires that the Radiation Protection Manager would have the same requirements essentially as the Station Manager. The requirements to have an individual of this qualification on each nuclear power site is unreasonable.

Duke Power Company feels very strongly on this issue and we have made our position known numerous times, as recently as our letter of March 21, 1979 in a proposed revision to the Oconee Technical Specifications.

In emphasizing to the NRC our concerns, Duke Power Company wishes to point out that engineers that supervise the conduct of preoperational and startup tests are supervised by personnel with considerably more experience than the engineer himself.

In conclusion, Duke Power Company wishes to stress that the above sections indicate levels of personnel qualifications that simply would not be available in the numbers required to successfully conduct a startup test program of

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reasonable duration. Although it is highly desirable to have individuals who initially meet these qualifications, our experience to date has shown that this is not obtainable in all areas. We feel some provisions should be made to allow individuals with less training and qualifications to serve in these areas since the normal supervision process will assure proper conduct of the testing. In addition, all test results are required to be reviewed by the higher levels of station management and will insure that appropriate acceptance criteria have been verified.

Because of the highly successful startup and operation of Oconee Nuclear Station and the successful startup now being conducted at McGuire Nuclear Station and the program as planned at Catawba Nuclear Station, we feel that Duke Power Company has a realistic feel for the items discussed in this letter, and therefore, Duke Power Company must take exception to the subject regulatory guide in the areas indicated and we also request that consideration for relief must be given for the items as we have listed them.

Very truly yours,

William O. Parker, Jr.
William O. Parker, Jr. *By JKB*
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