

SECRET  
PROPOSED

*Notice  
Reg. Guide*

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Dothan, AL 36303  
April 19, 1979



Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Attn: Docketing and Service Branch  
Washington, D.C. 20555

SUBJECT: Comments on Proposed Revision 2 to Regulatory Guide 1.8

Dear Sir,

The following are my comments on the proposed Revision 2 to Regulatory Guide 1.8 (Personnel Selection and Training). The first comments are addressed to Regulatory Position 3.a that states, "...Included in the one year of experience should be at least 3 months of indoctrination/training in nuclear power plant systems and component operations in a nuclear power plant that is substantially similar in design to the type at which the individual will perform the function." This statement raises some questions in my mind that I think should be clarified.

1. Question:

Does the three months of indoctrination/training mean formal organized training in nuclear power plant systems or could the three months of indoctrination/training be satisfied while working in a site startup group prior to the conduct of pre-operational tests?

Comment:

If this means three months of formal organized training in nuclear power plant systems, this could have significant impact on the personnel directing or supervising preoperational tests because, industry wide, most of these people have not been through three months of formal organized indoctrination/training other than navy nuclear training.

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2. Question:

Does typical navy nuclear training qualify as the three months of indoctrination/training for a commercial pressurized water reactor? Also does it meet the requirements for work on a boiling water reactor?

Comment:

As I stated previously, the navy nuclear program is the source of most of the personnel that are supervising the conduct of pre-operational tests. If navy nuclear training does not qualify as the three months of indoctrination/training and a formal training period is required, where does a person obtain this training if he has not been through a licensed operator training program? Currently the nuclear power industry does not offer a three month training program other than those oriented for licensed operators.

3. Question:

Is there some minimum amount of nuclear power plant experience that would be the equivalent of the three months of indoctrination/training?

Comment:

If the training desired is formal organized training there should be some amount of equivalent nuclear power plant experience listed to allow for those experienced startup people to continue working without the three months formal training.

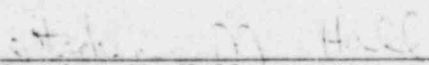
The second comments are more general and are addressed to Regulatory Position 3.a, b, c and d. Regulatory position C.1 of Regulatory Guide 1.58 specifically states that the requirements of ANSI N45.2.6-1973 apply during the preoperational and startup testing phase of nuclear plant construction. As a result of this, programs have been established throughout the nuclear industry to identify the three levels of capability for persons who perform and approve preoperational and startup tests. This Proposed Revision 2 to Regulatory Guide 1.8 presents a conflict to the certifications of ANSI N45.2.6-1973 by changing the minimum qualifications for persons who perform such work.

Since Regulatory Guide 1.58 specifically states that the qualifications of ANSI N45.2.6-1973 apply to preoperational and startup testing, I think the different and additional qualifications identified in Regulatory Position 3 of the Proposed Revision 2 to Regulatory Guide 1.8 add confusion and are not necessary.

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Sincerely,

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Stephen M. Hall