

APR 07 1980

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MEMORANDUM FOR: J. S. Wiebe, Office of Standards Development

Original Signed by

THRU: Robert L. Baer, Chief, Light Water Reactors Branch No. 2, DPM

FROM: R. A. Benedict, Project Manager, Light Water Reactors Branch No. 2, DPM

SUBJECT: PROPOSED RULEMAKING, 10 CFR 55, OPERATORS LICENSES (RS-019-1)

The March 21, 1980 memorandum from W. M. Morrison requested comments on the proposed rule. Enclosed are my comments, both editorial and substantive, regarding the Rule and the Value/Impact Statement.

Mr. Morrison's memorandum also asked whether or not the SRO and RO experience and training should be specified in the regulation. I suggest that it be spelled out in a Regulatory Guide rather than in a Regulation because of the difficulty in changing regulations to keep up with changes in requirements.

Original Signed by

R. A. Benedict
Light Water Reactors Branch No. 2
Division of Project Management

Enclosure:
Comments

ccs w/enclosure:
P. F. Collins
J. C. Stone
W. M. Morrison
D. B. Vassallo
L. P. Crocker
S. A. Varga

L-4-1, Pt. 55

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DATE	4/7/80	4/7/80			

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Proposed Rule (Enclosure A):

- Page 6, Item 4(d) The first word in the fourth line should be "simulator's".
- Page 7, Item 5 In the third line, apostrophize "applicants".
- Page 7, Item (b)(3) For clarity, make this item read "Reactivity and the effects of poisons".
- Page 10, Item (d)(1) Add "flow" to the list.
- Page 10, Item (d)(4) "Reason" should be plural.
- Page 10, Item (f)(1) Add the word "and" at the end of the second line (following "interlocks,").
- Page 13, Item (c)(1) In the first line, change "which" to "that". This comment also applies elsewhere.
- Page 13, Item (d)(2) Add "flow" to the list.
- Page 13, Item (e)(1) Correct the spelling of "involved".
- Page 13, Add an Item (g) "Emergency procedures, including onsite and offsite notifications".
- Page 14, Item 8 It might not be too unreasonable to have the applicant trained on a reactor manufactured by the same reactor vendor as the one on which he is seeking a license. This comment also applies to Item 15 on page 18.
- Page 19, Third Line Apostrophize "simulators".

Value/Impact Statement (Enclosure D):

On page 3, Item 3 says that there will be less down-time and more efficient utilization of the facility. This is an obvious advantage to the industry. However, Item 4 seems to forget that these favorable industry factors would pass through to the consuming public, thus reducing rates for the service.