

PUGET
POWER

June 3, 1980
PLN-228

Mr. Harold R. Denton
Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

We have reviewed NUREG/CR-1280 Power Plant Staffing prepared by W. Wegner of Basic Energy Technology Associates, Inc. and have several comments we would like to submit. In general, we feel that the authors have done a commendable job in their comparison of the Naval Nuclear Propulsion Program practices with the current requirements and practices of the NRC and the commercial nuclear power industry. We find that we agree with many of the observations and recommendations in the report.

As a general comment, we believe it to be of vital importance that NRC work closely with the Institute for Nuclear Power Operations in developing any new requirements in this area. We feel that INPO could bring considerable expertise to bear on this subject. We are in complete agreement with section V.E. of NUREG/CR-1280 which stresses the importance of the evolving relationship between NRC, INPO and the industry.

Our specific comments on NUREG/CR-1280 are as follows:

1. Recommendation IV.D.1, Page 10

- A. While we agree that a formal training program and certification as outlined in the subparagraph a is desirable, we feel that issuance of licenses by the NRC is simply an additional and unnecessary administrative step. The benefits of a training and certification program can be achieved by simply factoring it into the plant's training program. The implementation of the program can be readily verified by the NRC resident I&E inspector.
- B. The 3 years of experience proposed by item "C" is apparently not required by the Navy. This amount of experience may be difficult to obtain particularly when staffing a new facility before the initial fuel loading. Compliance with such a requirement would likely be accomplished by hiring individuals away from other companies; a practice which could be detrimental to the stability of the industry. We suggest that at least a portion of any experience requirement should allow credit for additional formal and on-the-job training conducted during the pre-operational test and startup period.

X 605,10

- C. Item "d" should be clarified if these recommendations are adopted. As written, it appears that code welding and radiography, for instance, are being required for all maintenance personnel. We do not believe this was the intent.
- D. With regard to the listing of individuals who would not need to be certified as reactor technicians: We believe that crafts who work only in shops should be considered on a case by case basis, since this category could include mechanics and instrument technicians working on safety-related equipment.

2. Recommendation IV.D.2, Page 12

We disagree strongly that maintenance procedures should be submitted to NRC for review. The NRC does not have the resources to perform such a review and may resort to hiring maintenance engineers from nuclear plants and vendors thus reducing the number of experienced people available to the plants. Additionally, we believe that the personnel most qualified to write, review and approve such procedures are those that build, install and maintain the equipment. The general procedures could be described in the FSAR and the resident I & E inspector can verify the procedures are in place and are properly utilized.

3. Recommendation VI.E.1, Page 29

While we agree in principle that a shift engineer could perform a useful function, the individual should not be restricted to the technical organization. Additional flexibility is possible if senior plant staff members such as the Operations Manager and Assistance Plant Manager could perform this function on a rotational basis. Additionally, we assume although not specified, that only one shift engineer is being proposed per site regardless of the number of operating reactors.

4. Recommendation VII.D.2, Page 34

Our experience and knowledge of the operating organizations in several plants leads us to believe that the observation of autonomy of the Senior Onsite Manager is inaccurate. Most companies often use headquarters staff, vendor or consultant advice and review of changes in operating or maintenance procedures where necessary. Additionally, those procedural changes involving safety related systems often have a review by the On-site and Off-site Review Committees. As stated previously we believe that the personnel most qualified to change procedures are those that work with the equipment and procedures on a day-to-day basis. Furthermore, we believe that the safety evaluations required by 10 CFR 50.59 provide sufficient control over design and procedure changes.

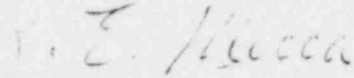
5. Recommendation V.E.3, Page 23

A regulation requiring the company to obtain from prospective employees a waiver of the Privacy Act and make it a punishable offense to lie or

withhold information on an application would be beneficial to the industry. We support this recommendation.

We appreciate the opportunity to comment on the document.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. E. Mecca".

J. E. Mecca, Manager
Nuclear Licensing & Safety

RAN/bw