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INSTITUTE OF NUCLEAR POWER OPERATIONS

August 27, 1980

Mr. Domenic B. Vassello
Chief of Licensee Qualifications Branch
Division of Human Factors Safety
Room 268, Philipps Building
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Draft "Clarification- NUREG 0578," Item 2.2.1.B-
Shift Technical Advisor- Enclosure No. 2

Dear Mr. Vassello:

In our August 15, 1980 meeting you requested comments on the draft version of the subject, "Clarification." Our comments are as follows:

In the second paragraph under the heading, "Clarification," we note that elimination of the shift technical advisor is contingent upon improving the man/machine interface in the control room as well as upgrading the qualifications of key shift personnel. We agree that the education and the training of the referenced shift personnel, as well as others, should be improved and much of INPO's work is being devoted to this improvement. We also agree that the man/machine interface can be improved in many installations and, as you are aware, evaluation of existing control rooms as well as developing methods for improvement are an important part of INPO's activities. We do believe, however, that elimination of the STA position should not be contingent upon both.

Industry experience supports the thinking that a well trained and fully qualified staff can operate a nuclear plant safely and reliably, even though the ideal control room configuration does not exist. Even the definition of an ideal board would be highly subjective. We recommend that elimination of the STA be contingent upon the development of the necessary manipulation and analytic skills alone and that improvements in the man/machine interface be pursued as a separate and continuing effort dedicated to developing the synergism that must exist for safe operations.

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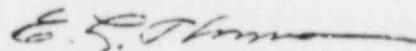
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Paragraph 5, under the heading, "Clarification," begins with the statement that, "The staff is not yet in a position to fully endorse a set of minimum requirements----". We recommend that the word "minimum" be deleted. Elimination of the word "minimum" would not change the intent of the sentence. In fact, elimination would improve the position of both INPO and the NRC with regard to the level of improvement sought.

We appreciate the staff's recognition of the difficulties that licensees are having in implementing the specialized education programs. We do believe that well planned and executed programs will produce the level of education and training needed much better than educationally weak crash programs that only fill squares.

Sincerely,



E.L. Thomas
Acting Director
Training and Education Division

ELT/dgh
Enclosure

cc: E.P. Wilkinson