

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

August 8, 1980

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulations
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Denton:

In accordance with the April 24, 1980, Federal Register notice (45 FR 27855-27856), we are pleased to provide comments on NUREG/CR-1280, the "Power Plant Staffing" report.

The Tennessee Valley Authority (TVA) has long recognized the benefits of a strong training and qualification program for the nuclear power industry. We have implemented a comprehensive training and evaluation program for all levels of plant staff. Our program emphasizes schooling in the basic theoretical fundamentals of nuclear engineering as well as practical training in simulated operating circumstances. Moreover, personnel are subject to careful, ongoing evaluations once duties are assumed in a plant. We are proud that TVA's program exceeds the Commission's requirements and other programs common in the industry.

We believe that the review of the NUPEG should recognize some of the limitations inherent in the study. It appears that the sole basis of comparison between civilian nuclear power plant practices and those of the Navy's nuclear propulsion program was data from three unnamed utility companies, which may or may not be representative of the industry as a whole. Visits to civilian power plants or training centers utilizing simulators were not made.

The positive statements concerning Navy program practices were evidently made by persons having an in-depth knowledge of Navy requirements and standards. These comments revealed an enviable program with proven results. In our opinion, however, the statements concerning the civilian nuclear industry given as a parallel to the nuclear Navy lacked in-depth knowledge and were not completely accurate when applied to the total

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civilian nuclear power industry. For instance, the Navy requires certification of nonoperational employees (see the relevant comparison comment attributed to the Navy). We do not agree that the civilian licensing concept should require the certification of such employees. A fair comparison between the nuclear Navy and the civilian nuclear power industry should include utilities whose practices are recognized as setting standards for the industry. The 50 items stated in the report concerning TMI-2 and compared with the nuclear Navy should receive a comparison vis-a-vis one of the above utilities, as well as the Navy.

We believe the NUREG errs when it assumes that all utilities can be grouped together and pertinent comments addressed to such a diverse agglomeration. Each utility makes its own interpretation of NRC requirements and each complies with those requirements in accordance with that interpretation within the parameters set by NRC. Some utilities comply at the minimally acceptable level; others go far beyond the minimum required. Qualification and training are areas where wide differences exist.

TVA is working closely with the Institute of Nuclear Power Operations (INPO) in establishing common industry training and qualification standards. INPO, along with members of the nuclear industry and the academic community, is establishing benchmarks of excellence. Uniform standards for the nuclear industry can best be achieved through the activities of these groups, and we concur with the report concerning training and qualification standards for maintenance and operating personnel. Many recommendations listed in the report should receive attention by the industry. Several groups are developing standards that address these recommendations and certainly this report should be included for review in search of original considerations applicable to each unique concern.

We also believe several items mentioned in the NUREG properly fall within the primary responsibility of plant management and do not depend on NRC for direction, e.g., tolerance of drug use, surveillance procedure management, simulator utilization, etc. The nuclear Navy program operates within the "captured plant complement" concept that only military necessity provides. Due to its very nature, the nuclear Navy program must emphasize secrecy. Civilian programs, on the other hand, must be developed in a way that is compatible with a free society. This includes providing a free flow of information to the general public, whether perceived as significant or not.

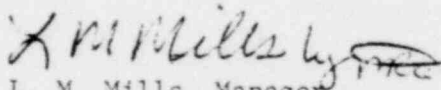
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We appreciate the opportunity to comment on the NUREG.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


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