

EDISON ELECTRIC INSTITUTE

The association of electric companies

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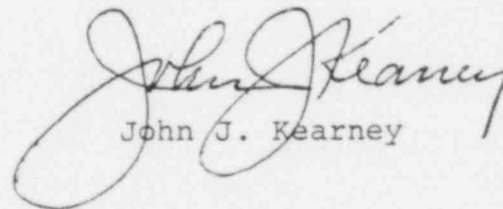
Mr. Domenic B. Vassallo
Chief, Licensee Qualifications Branch
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Vassallo:

We appreciate the NRC's continued willingness to seek input from the utility industry in developing the NRC document on Criteria for Utility Management and Technical Competence. The July 17, 1980 draft of the document is a major improvement over the previous draft and additional improvements are encouraged. The document appears to be more a set of guidelines than criteria and we encourage that the title be changed to recognize this distinction.

Enclosed for your consideration in making improvements are general comments on the July 17 draft of the document. We will be pleased to discuss these comments in greater detail at your convenience.

Sincerely,


John J. Kearney

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Enclosure

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EDISON ELECTRIC INSTITUTE
COMMENTS ON THE
NRC DRAFT CRITERIA FOR
UTILITY MANAGEMENT AND TECHNICAL COMPETENCE

General comments on the July 17, 1980 draft of the Criteria for Utility Management and Technical Competence are offered for your continued development of the document. In general, this draft is a major improvement over the previous version. We urge the NRC to continue to prepare these guidelines in a manner that recognizes the unique and special measures that every electric utility faces in serving the safety needs of society and also assuring a reliable and economical supply of electricity. It should also be recognized that utility management structures may be different from one phase to another, i.e. plant construction, plant operation, and temporary management modes during accident conditions or a post-accident recovery period. This guideline is appropriate only for an operating nuclear power plant phase and an emergency situation.

The July 17, 1980 draft provides reasonable guidelines, with some changes suggested below, but the document appears to be mislabeled by referring to such guidelines as criteria. A preferred title for the document is: Guidelines for Utility Management Structure and Technical Resources for an Operating Nuclear Power Plant. Such a title more clearly describes the content of the document.

Members of the Edison Electric Institute's Executive Advisory Committee on Nuclear Power have reviewed the document and also worked closely with the Task Force of the Atomic Industrial Forum that presented comments to you in August. The

Committee concurs with the general and specific comments of the Task Force. The following general comments are provided to complement the input received from the AIF Task Force:

o Major Staffing Changes

The guidelines indicate a need for staffing increases in many nuclear utility organizations. While the number of persons and the educational requirements specified may be desirable and attainable in the long term, they are not available immediately. Such requirements must be phased in over a reasonable period of time, which may well extend beyond two years. A plan for satisfying the guidelines over a reasonable period of time should be acceptable for continued operation of existing nuclear plants and for obtaining near term operating licenses. The many changes that have been implemented at all plants since the Three Mile Island accident are appropriate and sufficient to permit the phased additional improvements in staffing. The industry as a whole is presently experiencing a limited supply of qualified personnel and specific steps are being taken to overcome this limitation. Any sudden establishment of additional requirements will aggravate this situation unnecessarily and could have a negative impact on short range safety implications. A flexible approach that encourages the cross utilization of the best available talent within the industry is needed concurrently with the encouragement of nuclear related career paths within the educational system.

o Educational Equivalency

Specific requirements for demonstration of technical competence, particularly requirements for college degrees or course work, may not achieve the desired result. A college-level course on a particular subject may be entirely lacking in the information needed for the practical safe operation of a nuclear power plant. A properly developed course need not be conducted at or by an accredited collegiate institution to achieve the desired goal. Specific requirements for experience and college degrees may also be counterproductive. For example, requiring that shift supervisors be degreed effectively blocks advancement of operations personnel, resulting in demotivation and increased difficulty in recruiting high quality operators. For example, this may diminish the interest of experienced navy nuclear operating personnel from joining the civilian programs. Similarly, the description of management resources contains requirements for experience and education that may preclude selection of the most capable individuals. A balance of prescribed education and experience and a means of achieving equivalency is urged to permit the achievement of the desired safety in operation. The Institute of Nuclear Power Operations is continuing to address the consideration of educational equivalency and its recommendations should be recognized. Individual development of technical and language skills along with fundamental and practical training should be considered as acceptable equivalent to an engineering degree for many positions.

o Prescriptive Designations

The objective of improving plant safety is appropriately stressed throughout the document. However, very prescriptive designations are provided in several areas that appear to eliminate the flexibility that is necessary in plant operations and which has been carefully preserved in ANS 3.2. The detailed educational requirements with identification of specific courses is excessively prescriptive. One example is the discussion of specifically required college-level courses for on-shift personnel. The constraint on personnel location within the plant and the requirement of who should sign the certification of operating personnel are other examples of excessive prescriptiveness. The objectives should be defined and the utility should be permitted some flexibility for achieving the objectives.

o Emergency Situations

The criteria for accident conditions should establish goals for the utility organization, rather than listing requirements for specific individuals. Since the objective during the initial hours is to place the plant in a stable condition, success during this phase is fundamentally dependent on an organization which is well trained, established with clear lines of authority and responsibility, provided with well thought out procedural guidance and not overburdened with extensive accident reporting and communications requirements. Considering the wide range of situations that could exist in an emergency condition, the Plant Manager should be assigned

the latitude to exercise judgement concerning the need for management and technical personnel and their assigned locations. It is neither prudent nor productive to unnecessarily restrict the Plant Manager in the assignment of vital personnel resources during unstable conditions.

In actual practice, power plant emergency situations are best handled by involving the minimum number of people and limiting those people to those having the authority, knowledge and inclination to solve the problems. To impose criteria, practices and procedures which inhibit or constrain this principle is counterproductive. When the owner and the NRC have determined that the facility staff is qualified and competent, that staff should be given the appropriate latitude and discretion on the application of its resources to the resolution of the problem.

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