

PDR



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

OCT 20 1980

Mr. Robert H. Leyse  
12525 Saratoga Creek Drive  
Saratoga, California 95070

Dear Mr. Leyse:

In a letter dated September 16, 1980, I informed you that I would provide you with the basis for the statement contained in NUREG/CR-1280, "Too often the utilities fall back on the very dangerous defense that their training and qualification program must be adequate because they have not had a Three Mile Island accident." The following is based on discussions I have had with the contractor, Basic Energy Technology Associates, Inc. (BETA), that wrote CR-1280.

At the time NUREG/CR-1280 was written, BETA, had had an opportunity to interface with people from a number of nuclear utilities, either on a contractual basis or through informal discussions. They also had discussions with knowledgeable people in the business of providing training services to nuclear utilities, governmental agencies and the nuclear suppliers. These discussions, which spanned a period of some six months (August 1979 through January 1980), formed the basis for the comment.

While it is impossible to cite the exact numbers of people with whom BETA had discussions relating to this issue the number was in excess of fifteen and a number of them had had similar discussions with others. Of those they talked with, many expressed the same opinion and none disagreed with it. Incidentally, discussions with similar types of people since that time further support the comment, although the situation is improving.

The comment you have cited should in our opinion be read in the context of the entire report and with an understanding of the situation which existed in the nuclear utility industry prior to March 28, 1979, and following. By and large, nuclear utilities sincerely felt they had done a creditable job in training their operators. They had worked closely with the nuclear suppliers and NRC had licensed their operators. Not only that, many had gone out of their way to hire ex-navy nuclear operators with the expectation that they were getting well-trained personnel. In the period immediately following the accident, top management of the nuclear utilities were often put on the spot in their local areas with questions relating to the adequacy of their own operation. A logical position to take was one of self-defense and it was a position they really believed to be true. Where this did harm was within the utility itself, where people charged with the responsibility to go take a hard look at their programs were faced with the situation that the utility had already taken the position that these programs were satisfactory.

Enclosed is a copy of a letter to All Power Reactor Applicants and Licensees from H. R. Denton, dated March 28, 1980. This letter details some of the improvements we have already required regarding qualifications and training of operators.

8011070333

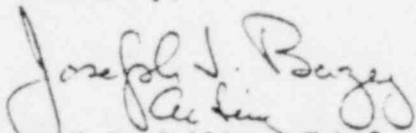
NUREG

Mr. R. H. Leyse

- 2 -

I hope this information will be of use to you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul F. Collins".

Paul F. Collins, Chief  
Operator Licensing Branch  
Division of Human Factors Safety

Enclosure:

Ltr. dtd. 3/28/80 from  
HR Denton to All Power  
Reactors Applicants and  
Licensees.