

RS 807-5

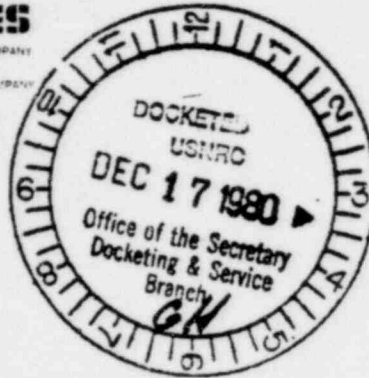
DOCKET NUMBER
PROPOSED RULE

PR *mic notice*
Reg Guide

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
THE HARTFORD ELECTRIC LIGHT COMPANY
EASTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY



P.O. BOX 270
HARTFORD, CONNECTICUT 06101
(203) 666-6911

December 5, 1980

Docket Nos. 50-213
50-245
50-336
50-423
810132

Secretary of the Commission
Attn: Docketing and Service Branch
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

References: (1) Second Proposed Revision 2 to Regulatory Guide 1.8 -
Personal Qualification and Training.

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Comments on Draft Revision 2 to
Regulatory Guide 1.8

In Reference (1), comments were solicited by the NRC Staff on a proposed revision to Regulatory Guide 1.8. On behalf of the Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO), Northeast Utilities Service Company (NUSCO) is hereby offering the following comments on Proposed Revision 2 to Regulatory Guide 1.8, Personal Qualification and Training.

The restrictions that temporary personnel may not be used as replacements for periods exceeding one (1) month as described in Section 1.2.1 of Reference (1) is not realistic and should be revised to reflect Section 3.1 of ANS 3.1 which specifies three (3) months. The one (1) month period provided by Reference (1) is inadequate for interviewing, screening, selecting and hiring a candidate. Additional time is required to provide for physical examinations, psychological examinations and other security related matters required prior to plant employment.

NUSCO disagrees with the requirement in Section 1.4.b of Reference (1) that senior corporate management certify applicants for senior and operator licenses. The Station Superintendent is responsible for the safe operation of the facility and is in a better position from which to judge the competency of license applicants. The Regulatory Guide should reflect this. The requirements of Section 1.4.b would relieve the Station Superintendent of a portion of his responsibilities and could detract from the safe operation of the facility.

8101220 404

12/19/80

Acknowledged by card.....

TH

To facilitate the efficient use of available manpower within the facility, the requirement of Section 1.4.d should be clarified to allow a reactor operator, acting as a senior operator applicant on shift, to fulfill one of the operator license requirements of the plant Technical Specifications.

Section 2 of Reference (1) discusses the exceptions and supplements to the qualifications of facility personnel. The provision for case-by-case evaluations of individuals who do not meet the qualifications as stated in the standard should not be arbitrarily restricted. Exceptions which, perhaps utilize more stringent evaluation criteria, should be permitted for the positions of plant manager, operations manager, radiation protection manager, and shift supervisor.

The educational requirements of the Regulatory Guide should apply not to the individual job title but to the department associated with the manager or supervisor. In this way, the manager or supervisor can be supplemented with professional individuals possessing the required educational qualifications. The requirement for the Shift Supervisor to have at least a Bachelor of Science Degree should be deleted and replaced with alternative 3 of Appendix A of Reference (1). Alternative 3 would be acceptable if the minimum requirements for the education, training, and experience for STA's provided by the Institute for Nuclear Power Operations (INPO) were fulfilled. This would eliminate much of the hodge-podge of unintegrated and vaguely related material which would be required in the 60 hour course described in Appendix B of Reference (1).

Included in Reference (1) were excerpts from several reports prepared for the Staff by independent consultants dealing with power plant staffing and management and technical resources. NUSCO disagrees with the recommendation by Basic Energy Technology Associates, Inc. (BETA) that a "Shift Engineer" have the power and responsibility to direct the Shift Supervisor. The effect of the recommendation on the safety of the plant would not be positive. As the Shift Supervisor is acting Station Superintendent in the primary's absence, this recommendation places the "Shift Engineer" over the Station Superintendent in responsibility which is clearly not the intent of this Regulatory Guide. This position is reinforced by the excerpt from the Teknekron Research, Inc., report included as Attachment 2 to Appendix A to Reference (1). The Shift Supervisor has short term management responsibility in the absence of the plant manager or station superintendent and is "the single most important resource in the event of an accident." Placing a "Shift Engineer" above him would detract from the safety of the plant, especially in off-normal situations.

The Teknekron report emphasizes the qualities which the Shift Supervisor must exhibit, however the degree to which these qualities exist in each candidate cannot be quantified and are, therefore subjective in nature. The Staff states that "due credit should be given shift supervisors for demonstrated ability to perform their duties." NUSCO questions the need for additional training or qualification for the shift supervisors if it is determined that they are currently able to perform their duties.

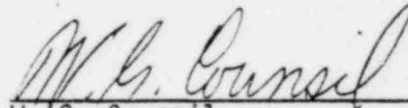
Substantial consideration must be given to the concerns of the Atomic Industrial Forum (AIF) that this proposed Regulatory Guide may create a high turnover rate and thereby adversely affect plant safety.

Finally, it appears that this proposed Regulatory Guide may be premature. Much of the content of Reference (1) is based on conclusions reached in NUREG/CR-1280 and NUREG/CR-1656. Public comments have been solicited on both of these documents. The final versions of these NUREG's should be available prior to drafting Regulatory Guide 1.8, Personnel Qualification and Training.

We trust these comments will be given due consideration.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

A handwritten signature in cursive script, reading "W. G. Council", is written over a horizontal line.

W. G. Council
Senior Vice President