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Mr. Harold Denton, Director
Office of Nuclear Reactor Regulation
United States Regulatory Commission
Washington, D. C. 20555

COMMENTS ON NUREG-0731
GUIDELINES FOR UTILITY MANAGEMENT
STRUCTURE AND TECHNICAL RESOURCES

Dear Mr. Denton:

In response to the Nuclear Regulatory Commission's request, Carolina Power & Light Company (CP&L) has reviewed Draft NUREG-0731, "Guidelines for Utility Management Structure and Technical Resources," September 1980. Although CP&L has several comments to offer for consideration, it is difficult to adequately address the many important provisions of NUREG-0731 which incorporate by reference the provisions of other unfinalized and unapproved documents which are also out for comment. Because NUREG-0731 relies so heavily upon many other documents, including ANS 3.1, "Standards for Qualification and Training of Personnel for Nuclear Power Plants" (December 6, 1979); ANS 3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plant" (Draft 5, June 1980); Regulatory Guide 1.8, "Personnel Qualification and Training" (Proposed Revision 2, September 1980); and Regulatory Guide 1.33, "Quality Assurance Program Requirements" (Proposed Revision 3, June 1980, CP&L suggests that the next draft of NUREG-0731 not be issued for review and comment until the outstanding issues raised in these other documents are resolved. CP&L believes that such a procedure would eliminate confusion and would ensure consistent treatment of similar issues in all documents which are applicable to utility management structure and technical resources. Presently, CP&L feels that the above listed documents are inadequate and unacceptable in many areas and will comment on them as appropriate in the future.

In addition to CP&L's urging that the NRC not finalize this document until the documents to which it refers are finalized, CP&L requests the Commission to consider the Company's additional general and specific comments set forth below:

1. In general, the qualification requirements for personnel are too prescriptive and unnecessarily restrictive. The guidelines should permit consideration of equivalent experience and training. It is imperative that well qualified people are not

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excluded from serving in various positions because they do not have the prescribed educational backgrounds. For example, Tables 2 and 3 contain requirements, particularly academic degrees, which are far too specific. There must be general provisions for equivalent experience in lieu of a formal college degree. The use of a specific degree as a training requirement in these tables shows a misunderstanding of the nature of engineering experience. One's college field may have little or nothing to do with one's field of expertise after five or ten years of actual work experience. To limit a licensee's choice of personnel by adherence to these simplistic rules of qualification may deprive utilities of the services of highly experienced and well qualified individuals. This would, of course, be detrimental to the health and safety of the public. In addition, by this approach, the person filling any of these positions may feel overqualified for routine operations or unable to advance due to unattainable qualification requirements, thereby gaining little professional satisfaction and leading to low morale and high turnover rates. Therefore, we suggest that the training column in Tables 2 and 3 be deleted. The specification of required experience levels and the judgment of company management of an individual's qualifications for each area of expertise are sufficient to ensure availability of qualified off-site personnel. To ensure consistency throughout regulatory guidelines, CP&L also recommends the training qualification requirements and equivalent experience levels for on-site personnel as defined by ANS 3.1, September 1979, Draft, be incorporated throughout NUREG-0731.

2. The guidelines for accident conditions contained in NUREG-0731 require actions to be taken and manning levels to be achieved within specific and restrictive time limits. Consideration must be given to the type of emergency, technical expertise of on-site personnel and those in the immediate vicinity, and geographic location of the plant from the home office before requiring off-site personnel to be on site within a specified period of time. Many utility corporate offices are over two-hour distances from their operating nuclear plants and therefore could not meet the requirements to have all people on site within that time. CP&L recommends the deletion of specific time limits for accident conditions manning from NUREG-0731 and, where time limits are required, that they be consistent with emergency plans which are reviewed by the Staff on a case-by-case basis.
3. The time limits to meet the manning requirements during accident conditions do not start at the same point in time for all actions. Namely, some actions are required to be complete by a specific time after the determination of an accident, others after the time of notification of the accident. CP&L believes that it would be wise to establish a common starting point in

time for all action requirements to avoid having "two clocks" to follow. Again, CP&L emphasizes the necessity that time limits be consistent with emergency plans which are reviewed by the Staff on a case-by-case basis.

4. An individual should not be required to work more than 14 consecutive days at extended hours without having two consecutive days off. There are times when an individual would work 14 consecutive days, but not at extended hours. Experience has shown that 14 or more consecutive days at normal working hours is not deleterious to the health and safety of the public. (Section II.A.2.d.1.j.4).
5. The technical requirements of a composite shift crew are the sum of the qualifications and training of the shift personnel. The licensed operators and the STA bring to each shift the required technical capability. Additional technical expertise is available to shift operators through both on-site and off-site technical personnel. Therefore, the section dealing with on-shift technical requirements should be deleted, and any changes in on-shift technical qualifications should be included in the specific training for the shift positions. In addition, the area of expertise listed as "Transient Analysis" brings to mind detailed computer simulations which are neither possible nor particularly helpful at the plant site. Expertise in "Transient Behavior" would show knowledge in the same area without unnecessary understanding of computer simulations (Section II.A.2.d.2.).
6. The offsite organization which puts all nuclear power activities including Licensing, Engineering, QA, and Design under one person is clearly unworkable for all but the smallest nuclear involvement. If any individual has all of these functions reporting to him, he could only function on the broadest policy level. CP&L, due to its larger commitment to nuclear power, has established a more diverse organizational structure, although the functional requirements in the NUREG can still be met to support CP&L's nuclear stations. Therefore, the statement allowing variability of utility organizations as long as certain functional requirements are retained is very important and should be stressed. (Section II.B.1).
7. It may not be appropriate in all organizations for the management official in overall charge of nuclear power to sign certification for operators, senior operators, and nuclear plant personnel in the category of managers, or to establish and approve the qualification requirements for all off-site staff management positions that support safety-related activities at the plant. Flexibility must be provided to allow the management official

in overall charge to ensure these actions are done, and at the same time, allow the organization to best serve the needs of the company based on its commitment to nuclear power safety. (Section II.B.2.a.).

8. The description of the Independent Safety Engineering Group (ISEG) is too restrictive in regard to the size of the group required on site. The NRC "TMI Action Plan," NUREG-660, realizes the possibility and potential desirability of different organizational structures. It is felt that qualifying statements such as included in the Action Plan should be made a part of this section as follows:

"For utilities with multiple sites, it may be possible to perform portions of the independent safety assessment function in a centralized location for all the utility's plants. In such cases, an onsite group still is required but it may be smaller than would be the case if it were performing the entire independent safety assessment function."

This approach not only prevents duplication of unnecessary expertise at separate plants, but provides a better opportunity for exchange of information between facilities on safety-related issues. It would seem to make more sense for NRC to review each proposed utility organization on its individual merits rather than specifying a fixed number of dedicated individuals at each nuclear plant. (Section II.B.2.b).

9. Training for off-site support personnel should not have to be provided to all personnel in all areas indicated, but should be provided only as needed and applicable to ensure their required level of expertise is maintained and to ensure their proper response to normal and accident conditions. (Section II.B.2.d).
10. The requirement for three two-man monitoring teams to be available at the Operational Support Center within one hour of determination of the accident condition should be changed to "at least two two-man monitoring teams." This could prevent other health physics duties from being neglected during the early stages of an emergency, and the number of monitoring teams could be increased as more people become available. (Section III.A.5.b.3).
11. Availability of 20 ANSI qualified health physics technicians per shift is excessive for environmental monitoring. A total of 20 health physics technicians per shift, not necessarily ANSI qualified, but with appropriate knowledge and training for environmental monitoring and other health physics activities is more appropriate and would allow all health physics functions to be carried out. (Section III.B.4.a.).

We appreciate the opportunity to comment on this draft of NUREG-0731 and will offer comments on its supporting documents as appropriate.

Yours very truly,



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