


RS 807-5

DOCKET NUMBER  
PROPOSED RULE PR *misc notice*  
*Reg Guide*

ARIZONA  PUBLIC SERVICE COMPANY  
P. O. BOX 21666 · PHOENIX, ARIZONA 85036



REGISTRATION  
MAIL ROOM  
DEC 17 AM 8 11  
GENERAL SERVICES  
BRANCH

Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

ATTENTION: Docketing and Service Branch

SUBJECT: Second Proposed Revision 2 to Regulatory Guide 1.8  
"Personnel Qualification and Training" Task No. RS 807-5

Dear Sir:

The purpose of this letter is to provide the comments of the Arizona Public Service Company on the subject Regulatory Guide as solicited by 45 FR 67804. Arizona Public Service strongly supports enhancement of nuclear safety by improving the training and qualification of the people who operate and maintain nuclear power plants.

It has not been shown that a degree will necessarily result in a higher level of knowledge to accomplish the specific task of operating a nuclear power plant. What is required is a detailed analysis of the job to determine what knowledge and skills are necessary and meaningful. Specific requirements can then be established for training and qualification of shift supervisors and other operations personnel. These requirements would probably include some technical courses as well as training in the methods of supervision and communications. The requirements should be universal throughout the industry for obtaining an RO or SRO license to establish some uniformity and consistency.

The intent should be to provide the necessary knowledge and skills to assist operators in performing their specific tasks more competently and aid shift supervisors in making better command decisions.

More specific comments on the subject Regulatory Guide are identified below for your consideration:

Acknowledged by NRC..... *12/15/80*

*I+P-11*

8101090718


- a. Section C.1.3 - The definition of "training institutions" in note 7 excludes two-year schools of higher learning such as junior or community colleges. Such a restriction is not consistent with Appendix A paragraph 3 on page 30 which includes two-year accredited colleges as training institutions, and with the requirement of ANS 3.1 for an Associate Degree (which is granted by two-year colleges) for selected positions. We strongly feel that accredited two-year colleges can and should play an important role in educating nuclear power plant personnel and should not be excluded from consideration.
- b. Section C.1.4.a. - The requirement for senior operator license candidates to have one year of experience as a licensed operator, at the plant for which the license is requested, is not consistent with the clarification on this requirement and NUREG-0737 Section 1.A.2.1, which accepts experience at another facility and also military experience.
- c. Section C.1.4.b. - It is not clear what constitutes "documented evidence of certification" which corporate management is to submit and retain on file. We feel a letter signed by the appropriately responsible individual should be adequate without a recitation of qualifications that are documented in corporate records.
- d. Section C.2.1 - States a limit on the number of personnel which can be evaluated for equivalence of the standard. The limit is 5% without NRC approval. If a person has qualifications which can be acceptable in lieu of the stated standard, why should there be a limit on the number of these individuals. This, in effect, says that this persons qualifications are not acceptable.
- e. Section C.2.3.1 - Requires the shift supervisor to have at least a bachelor of science degree that includes at least 60 semester hours in specified subjects. He is also required to have a senior operator license, which also requires the same 60 semester hours in specified subjects. To require the degree to include the specified 60 semester hours is redundant and could be construed to invalidate a degree which did not contain them. This section should be worded so it is clear that the specified 60 semester hours may be obtained before or after the degree is granted. The requirement for a bachelor of science degree for shift supervisors is a highly subjective one and not adequately supported in Appendix A. Management, leadership, and many other skills required of shift supervisors are gained primarily by experience and the relatively minor role of education in many of

these skills can easily be provided in other than a college environment. We agree that an emphasis on academic technical material such as the 60 hours of work included in the degree is desirable, but are not convinced that the disadvantage of requiring a degree in making shift supervisors more mobile and thereby encouraging turnover is balanced by any gain from added exposure to non-technical areas involved in completing a four-year college degree. We also share the concern noted by Beta on page 36 that such a requirement may close off an advancement path for reactor operators and thereby eventually lower the quality of persons applying for junior licensed positions.

- f. Section C.2.3.2 - Again it is not clear what constitutes "documented evidence of certification" which corporate management is to submit and retain on file.

We appreciate the opportunity to comment on such an important document as Regulatory Guide 1.8 and sharing our views with your department.

Sincerely,

  
G. Carl Andognini  
Vice President

JGS/pr