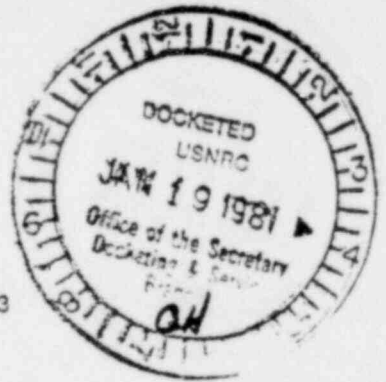




CHARLES CENTER • P.O. BOX 1475 • BALTIMORE, MARYLAND 21203



ARTHUR E. LUNGVALL, JR.  
VICE PRESIDENT  
SUPPLY

January 13, 1981

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

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

Docket Nos. 50-317  
50-318

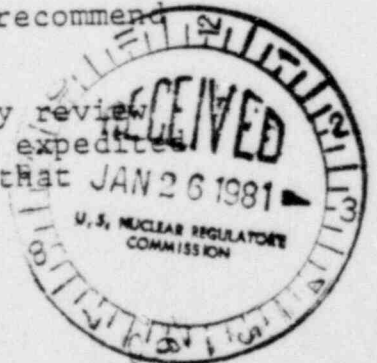
ATTN: Docketing and Service Branch

SUBJECT: Proposed Revision 2 to Regulatory Guide 1.8,  
"Personnel Qualification and Training",  
dated September 1980

We were recently informed by the Institute of Nuclear Power Operations (INPO) that through correspondence with the NRC they have become aware that the subject draft Regulatory Guide revision has received very little comment from industry and as a result may be issued virtually unchanged from its present proposed form. As you are undoubtedly aware, requests for comments on various standards and guides have increased dramatically since the TMI-2 incident and the ability of various industry organizations to review and comment on this vast amount of material is taxed to the limit. It is, therefore, understandable that few comments have been received concerning this proposed guide. We do not believe that the scarcity of comments indicates tacit approval, but is a reflection of the inability of industry as a whole to cope with the recent proliferation of such material from the NRC as well as other regulatory and industry related sources.

Regarding the specific draft in question, we feel the requirements of this draft will have a significant impact on the industry and that this draft revision and its companion document (Draft Standard ANS 3.1) should receive a coordinated industry review prior to issuance. To that end we recommend the following:

1. INPO be requested to coordinate an industry review and submit an INPO/Industry position on an expedited basis. It is our understanding from INPO that their organization supports this approach.



Acknowledged by card... 1/19/81

8102060635

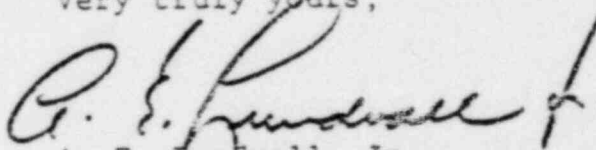
January 13, 1981

2. The review and comment period for this draft revision be extended to accomodate a schedule which is supportive of the review proposed above.

Even though we have not conducted a detailed review of the documents in question, our initial review has resulted in a major concern regarding Regulatory Position 2.3.1, which requires a BS degree for Shift Supervisors. We wish to indicate that we fully support the AIF comments made in their February 1980 report by the AIF Working Group on Action Plan Priorities and Resources. The details of this concern are set forth in Appendix A to the subject draft and express the concern that such a prescriptive regulatory requirement could actually have adverse effects on plant safety. We do not believe that the BETA and Teknekron Research, Inc., reports cited in Appendix A adequately address this problem. An INPO/Industry position, as recommended above, would be most useful in resolving this issue.

We appreciate the opportunity to provide our comments and recommendations concerning these important matters.

Very truly yours,

  
A. E. Lundvall, Jr.  
Vice President-Supply

AEL/RED/gla

cc: Executive Director for Operations, NRC  
E. P. Wilkerson, INPO  
R. W. Pack, INPO