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December 16, 1980

Mr Harold R Denton, Director  
Office of Nuclear Reactor Regulation  
U S Nuclear Regulatory Commission  
Washington, D C 20555

The following comments concerning the September, 1980, draft of NUREG-0731, "Guidelines for Utility Management Structure and Technical Resources", are presented for your consideration.

1. Page 2, fourth paragraph - Consumers Power Company believes that it would be unnecessarily difficult to make, in two years, the necessary staffing changes and other arrangements discussed in this NUREG. It is suggested that a period on the order of three years be allowed.
2. Page 3, II.A.1, first subparagraph - Consumers Power Company does not feel confident when using a draft of an industry standard because draft standards are subject to rapid change. Therefore, it is suggested that the portions of the draft standard, which NRC endorses, be spelled out in NUREG-0731, and that the reference be deleted.
3. Page 6, paragraph c - Consumers Power Company does not believe that improved control rooms will allow the elimination of the Shift Technical Advisor. Therefore, it is requested that the phrase, "and improved control rooms", be deleted.
4. Page 9, paragraph (j) - The third paragraph in the Introduction to this document states that in the final analysis, the safe operation of a plant depends on the utility's organization, training, procedures and utilization of personnel. In addition, NUREG-0731 is intended to describe minimum qualifications and procedures. Judging the intent of NUREG-0731, based on the Introduction, Consumers Power Company concludes that the second sentence of paragraph (j) is too prescriptive. Each utility must have maximum flexibility in the use of personnel, so that the achievement of the overall goal of plant safety can be pursued in the most efficient and effective way for each situation. Therefore, it is requested that the second sentence be deleted.
5. Page 10, first paragraph following (i) - The use of the word, "qualified", in the first sentence is inadequately specific. Consumers Power Company believes that the training, education or testing necessary for a person to be considered qualified should be presented. Therefore, it is requested that the

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necessary details be included in NUREG-0731, or if they exist in another document, that they be referenced in NUREG-0731.

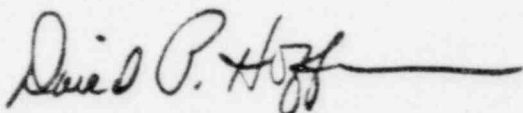
6. Page 11, paragraph B - This paragraph is entitled, "Offsite"; nevertheless, some of the information in this section describes onsite personnel (eg, page 15, paragraph b). Consumers Power Company believes that this mixing of on-site and offsite requirements makes use of NUREG-0731 unnecessarily difficult. Therefore, it is requested that the document be revised to separate the off-site and onsite requirements in a format which facilitates the use of the document.
7. Page 14, first paragraph - The qualifications for the management official in overall charge of nuclear operations include five years of nuclear plant experience. Consumers Power Company requests that "nuclear plant experience" be defined more precisely. In particular, is this experience limited to on-site experience or does offsite operations support experience also qualify?
8. Page 15, last sentence in paragraph (b) - Consumers Power Company believes that the last sentence in this paragraph is unnecessarily prescriptive, and is not in keeping with the third paragraph of the Introduction as discussed under Comment 4. Establishment of the details of the Independent Safety Engineering Group's organization and responsibilities should be left to the utility. Therefore, it is requested that this sentence be deleted.
9. Page 17, paragraph (5) - This paragraph requires that persons filling management positions in the offsite technical support staff have six years of experience in power plant operation and/or design. For many of the technical support groups such a requirement is highly desirable. However, for managers in the areas of reactor physics and safety analysis, six years of experience is unnecessarily restrictive. In these two areas, the development of expertise necessary to make the correct management decisions does not require extended hands-on experience. Consumers Power Company requests that the level of experience necessary to qualify for these management positions be reduced to three years.
10. Page 19, paragraph A - The first two sentences of this paragraph appear to be unclear. In the first sentence, who is the "utility operator"? Does this term refer to the "entire utility", or to a "portion of the utility"? In addition, Consumers Power Company requests that the second sentence be rewritten to state more directly its intent concerning the use of the existing organization.
11. Page 20, Figure 3 - Consumers Power Company believes that the Shift Technical Advisor should appear on this organization chart and requests that the figure be changed to show his position.

Mr Harold R Denton  
December 16, 1980

3

12. Section III, Guidelines for Accident Conditions - Consumers Power Company is not confident that the requirements in Section III have been coordinated with the other NRC efforts concerning the determination of criteria for Emergency Response Facilities (ERFs). Of particular concern to Consumers Power Company are the requirements for activation within two hours and staffing within four hours. Both of the requirements seem short by at least a factor of two. In addition, Consumers Power Company believes that having managers and staff on-call is unnecessary and suggests that it would be acceptable to use a call list and rely on statistical availability of the listed people to satisfy the management needs. Finally, Consumers Power Company requests that the criteria in Section III not be finalized until the associated NRC work on ERFs is complete. At that time, public input will have been received and problems resolved; thereby allowing the development of a consistent set of criteria throughout the NRC publications.

Please consider these comments in future revisions of this document.



David P Hoffman  
Nuclear Licensing Administrator