



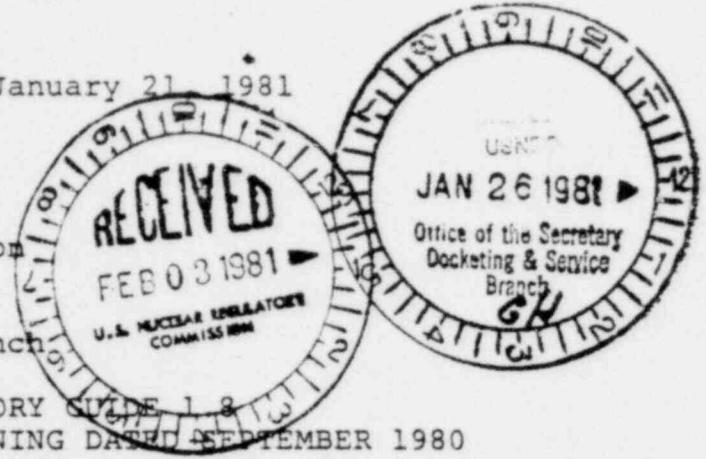
KANSAS GAS AND ELECTRIC COMPANY
WOLF CREEK GENERATING STATION

DOCKET NUMBER
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Reg Guide

January 21, 1981

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

ATTN: Docketing and Service Branch



PROPOSED REVISION TWO TO REGULATORY GUIDE 1.8
PERSONNEL QUALIFICATION AND TRAINING DATED SEPTEMBER 1980

KWOLO - 275

In order to fully evaluate this proposed regulatory guide at least one assumption must be made concerning the requirement of a shift technical adviser, as compared to the upgrading of the educational requirements for the shift supervisor. The problem comes when these requirements are compared under the light of long-term plant staffing.

The basic question is: Has the NRC accepted that if a shift supervisor meets the educational and experience requirements as outlined in the final approved Reg Guide 1.8, a shift technical adviser is not required?

If a shift technical adviser is not required, will Reg Guide 1.8 overrule the requirements of Nureg 0654 and if so, it should so state, since 0654 requires a shift technical adviser as part of the on-crew staff for functioning in the event of an emergency.

If the shift technical adviser is required, regardless of shift supervisor qualifications, the specific minimum levels required of education for the shift supervisor can and should be drastically altered.

A potential conflict has been created in these two jobs which can cause real problems in crisis situations. If one assumes that there are two individuals, both required by regulation, a shift supervisor and a shift technical adviser, and both with similar educational background i.e. specific experience and/or degrees; a very specific conflict is created if they disagree on a course of action. What for example is the control operator to do, especially if he personally agrees with the shift technical adviser i.e. the non-line responsibility position. This potential conflict is of concern both to the control operators and to the potential shift technical advisers and shift supervisors. It seems logical, therefore, to prevent the conflict by eliminating the need for both positions with the same levels of education. If the course chosen is to eliminate

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the dual need, a complete picture appears to be painted, i.e. on those shifts where the shift supervisor is there by virtue of experience only, a shift technical adviser is close by for technical guidance in the event of an emergency. On those shifts where the shift supervisor is there by means of his educational background and required experience, a shift technical adviser would not be assigned. It appears that this path is both proper and complete and if accepted, should be so identified by the NRC so that the planning aspects of utilities, especially those in construction, can proceed with assurance that the requirements in 1985 will not invalidate the planning of 1981.

Assuming the NRC decides in favor of the above path, the following comments are made.

The requirement to have sixty hours taught of specific subjects and that these subjects be tailored to the needs of the nuclear power industry can only help the industry, whether or not sixty hours is enough, too much, or not enough. The requirement that this be added to a BS degree, however, can only hurt the industry.

Rotating shift work is by its definition a demanding lifestyle. The creation of a set of requirements that when met will allow, or in reality, promote a rapid departure of qualified personnel off of shift work will cause the experience level of the nuclear power industry to drop and that can only be viewed as a serious problem. On the other hand additional education tailored to the industry needs, and therefore not readily transferable, can produce better operators and potentially safer plants.

I highly recommend, therefore, that alternate number three without the absolute need for a BS degree be adopted in Reg Guide 1.8 by the Nuclear Regulatory Commission.

Regulatory Guide Position Number 19

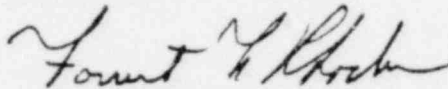
This position concerns the use of Position Task Analysis (PTA). This term seems to have been coined to solve all training problems. It is doubtful, however, that at least for a new plant, that PTA's can be established with any accuracy prior to operation. The use of PTA's should be established as an on-going area of upgrading as experience is gained in operation. The initial training programs should be based on position descriptions and job descriptions to the extent they can be foretold prior to operations.

Regulatory Position Number 23 (a) and (d)

The regulatory guide should make reference to the need for different requirements for SRO's who are not shift supervisors or the second

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SRO on shift, for example the other staff engineers who need or get a license in order to better perform their assigned jobs. The requirements for one year experience and three months on shift do not appear to be appropriate in this case. The implementation of these requirements, if they are applied to staff personnel, will simply cause a reduction in the number of non-shift licensed personnel and that does not appear to be an appropriate way to improve plant safety. A more specific example of this problem is the Training instructors. On one hand the need for licensed instructors is proper, but on the other it is very difficult to get the license regardless of training ability and knowledge using these experience factors.



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