



435 Sixth Avenue
Pittsburgh, Pa.
15219



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

(412) 458-6000

January 20, 1981



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

Attention: Docketing and Service Branch

Dear Sir:

Comments - Regulatory Guide 1.8

This letter addresses the proposed Revision 2 to Regulatory Guide 1.8, "Personnel Qualification and Training", dated September, 1980.

The following comments are submitted for your consideration:

(1) Shift Supervisor

The requirement of a Bachelor of Science Degree for Shift Supervisors is considered to be unnecessary and could cause increased personnel turnovers which would result in an average decrease in actual on shift experience in this job position. The Company does appreciate the benefits of having a properly trained Engineer on shift, but disagrees that this Engineer must be the Shift Supervisor. Furthermore, to implement this program in five years is not appropriate when implementation time, experience time and training are considered. January 1, 1989 rather than January 1, 1986 (page 21) would be more realistic. As noted on page 31, "... it would take a MINIMUM of 5 years to fully respond to the upgraded requirements. . ."

(2) Shift Technical Advisor

The Shift Technical Advisor (STA) position, in our view, should provide properly qualified individuals on shift for evaluation of current and scheduled operations with the aim of averting accidents, and providing an accident assessment function should an unusual situation occur. This person could provide the Engineer capabilities on shift in place of the Shift Supervisor; however, the STA should NOT be required to possess a Senior Operator's License, but should be given the appropriate training to assume responsibilities in the previously described areas.

Acknowledged by, card... 1/22/81

8102260 204

Handwritten notes:
1-21-81
Comments

(3) Senior Operator Experience as Reactor Operator

On page 12, under "a", the Senior Operator is required to have one year of experience as a Licensed Operator. The period of experience (one year) is considered excessive and should be reduced to six months or less. Furthermore, Union agreements may make the implementation of this requirement extremely difficult. It would be more reasonable that the experience be obtained by either performing duties as a Licensed Operator or by assignment to the Control Room to work with a Licensed Operator.

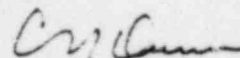
(4) Senior Operator Educational Requirements

On page 13, under item "c", the requirement for 60 semester hours of college level education for SRO's is noted. We do not consider that 60 semester hours are necessary for all SRO's, assuming these individuals have been given adequate (certified) technical training and qualified Engineers are on shift. Also, as noted in item 1, if the educational requirements are adopted, the time for implementing should be extended to 1989 to allow time for additional training and provide a sufficient period for gaining experience.

(5) Technicians' Experience

The requirement for three years of experience for Technicians (ANS 3.1, dated December 1979, Section 4.5.2 and accepted in Regulatory Guide 1.8, page 10) is also considered unnecessary. Three years will normally provide a Technician with far more time than necessary to gain the experience for his job. A shorter time period is needed for a Technician performing many of his job duties. The requirement hinders the effective utilization of trained and experienced personnel in jobs which require far less than three years of experience. One year experience and/or training and experience documentation for specific job assignments is more realistic and is recommended. The imposition of requiring a large number of years for job qualification could result in fewer numbers of qualified people for both normal operations and emergencies. This applies to other job positions as well.

Very truly yours,



C. N. Dunn
Vice President,
Operations