

WISCONSIN PUBLIC SERVICE CORPORATION

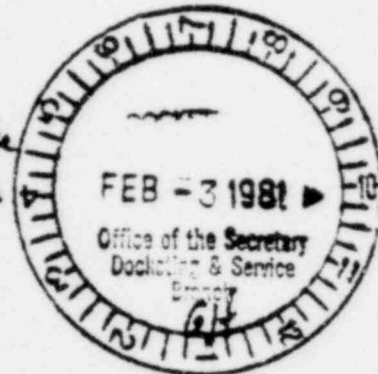


P.O. Box 1200, Green Bay, Wisconsin 54305

January 30, 1981

Green Bay

misc notice
Reg Guide
~~DUPLICATE~~
~~PROPOSED RULES~~



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

Attention: Docketing Service Branch

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Plant
Comments on Draft Regulatory Guide 1.8 (September 1980)



This letter transmits Wisconsin Public Service Corporation's (WPS) comments to the proposed regulatory guide on personnel qualifications and training. We recognize that the official comment period expired on December 5, 1980, but it is our understanding that comments will be considered if submitted by January 30, 1981.

A general comment on the proposed regulatory guide concerns the impact on licensing of certification and degree requirements for key personnel. While there may be some official benefit of certification and degree requirement to the regulatory agency, competency of the individual is determined by the qualification of the individual. We doubt that this certification process actually increases these qualifications. Accordingly, we feel that the benefit from such a requirement when measured in terms of increasing the margin of public health and safety is not commensurate with the time and specific commitment involved in obtaining the necessary certificate or degree.

The following are our specific comments on the references sections of the regulatory guide:

Section 1.2

We believe the time constraint of one month regarding the use of personnel as a temporary replacement is too restrictive. A key area of concern here is the amount of time it may take to fill the vacancy with a qualified individual often due to circumstances beyond our control. A qualified replacement for a key technical or managerial position normally cannot be filled within one month from the time the vacancy occurred. Plant staffs generally overlap in the technical area and the requirement for rapid filling of all these positions when a vacancy occurs defeats the intent of extra staff structure.

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Section 1.4.B

The requirement to have a Vice President certify competency of applicants for operators and senior operators licenses does not provide any additional safety margin to the public health and safety, while it increases the administrative burden on key personnel in the organization. Such a certification can only be processed on the results of the licensees training program and does not provide an additional review of the applicants qualifications. WPSC feels that the actual filing for application for an RO or SRO license represents an equivalent commitment of and to the individual and is in short a statement of the individuals competency. Furthermore, the specified licensing process by the NRC provides additional evidence of the competence of the individual, therefore, we feel this additional requirement is unwarranted.

Section 1.4.B

The requirement that applicants for an RO or SRO license have three months of on shift training with no concurrent duties is ambiguous. We feel that these personnel can gain valuable training and operating experience while performing their duties as an operator. This is especially true of applicants for an SRO license who already holds on RO license. These people can perform their routine duties on shift without affecting their training requirements. We believe it is more efficient use of manpower and a more effective training tool to allow SRO applicants to utilize their RO skills by retraining and RO responsibilities on shift while training for SRO license.

Section 1.4.E

In regard to increased requirements for simulator training, we are concerned that this could result in an emphasis on personnel to learn the emergency operating procedures for the simulator at the expense of their own emergency operating procedures. While we recognize the values in a simulator experience and training we caution that requirements in this regard should be tempered to recognize that generally simulators are not plant specific and as such are intended to stimulate the thinking process.

Section 2.2.1

As stated in our general comments above, we do not feel that NRC certification of managers, especially plant managers, will provide additional qualification to personnel. It is in a utilities' own best interest to provide qualified personnel in key "if not all" positions. This requirement to obtain additional certification by the NRC would result in a large expenditure of time and administrative process without increase in true safety and seems to be adding to the administrative load already stated for removal.

Section 2.2.3

We believe that this qualification requirements for radiation protection manager should allow more utility latitude. Specifically the requirement that the radiation protection manager have two years of the previous six years in a supervisory position in health physics appears to be excessive. With proper supervision previous supervisory responsibility should be adjustable.

Secretary of Commission
January 30, 1981
Page 3

Section 2.3.1

WPSC opposes the requirement that shift supervisors must have a college degree in physics. We do not feel that a college degree is the only proof of the competency of an individual to hold this job. We feel that applicable experience and job performance are also indicative of the individuals capability to perform as shift supervisor. Furthermore, to limit shift supervisor position to degreed personnel may prevent suitably qualified operators from obtaining that job and create a morale problem due to lack of advancement. We feel that experience, job performance, and appropriate training are acceptable requirements for this position.

Section 2.3.2

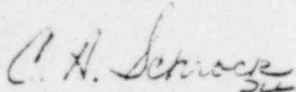
Our position on operator certification of shift supervisor is stated in the general comments at the beginning of this letter.

Section 2.8

We believe on-the-job training should be allowed more credit in the qualification of technicians. Secondly, we feel that it is more important to train technicians in plant specific regulations and standards instead of national standards or federal regulations. This is due to the fact that plant standards are generally more conservative than others and, therefore, factually make up the job requirements for the technician. For example, the Kewaunee standards for radiation protection are more conservative than those specified by 10CFR20.

WPSC appreciates the opportunity for comment on this regulatory guide and hopes that these comments will be given consideration.

Very truly yours,



C. A. Schrock
Nuclear Licensing Supervisor

d11