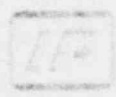


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Reg Guide

ILLINOIS POWER COMPANY



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500 SOUTH 27TH STREET, DECATUR, ILLINOIS 62525

January 26, 1981

Mr. Samuel J. Chilk, Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Service Branch

Dear Mr. Chilk:

Proposed Revision 2 to Regulatory Guide 1.8

Illinois Power Company hereby offers comments on proposed Revision 2 to Regulatory Guide 1.8, Personnel Qualification and Training, dated September, 1980.

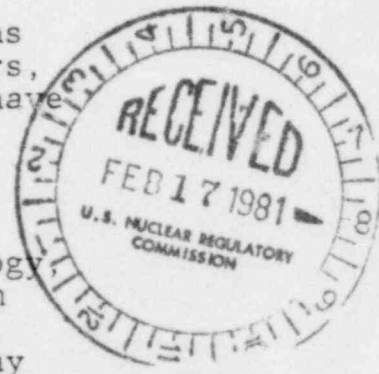
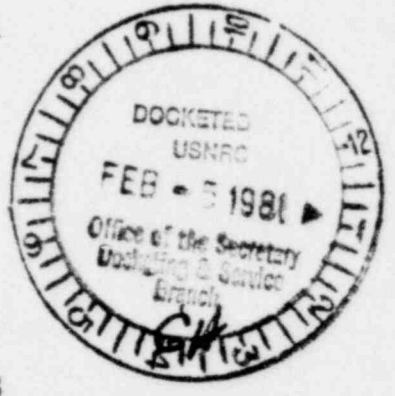
Our comments are as follows:

The requirement for Shift Supervisors and Operations Managers to be degreed, in lieu of all other factors, is unnecessarily restrictive and will undoubtedly have a very negative impact on the industry.

First of all, the NRC has indicated, in Appendix A, that inherent in a degree are courses in oral and written communication, leadership, applied psychology, political science, and economics. This is far from the truth. Most colleges allow students to select liberal arts electives from a large listing that may also include philosophy, art, and foreign languages. The regulatory position requires no specific liberal arts courses and even if it did there would be no guarantee that these courses would have practical application to the job. The key point is that any individual who has the competence and experience to be considered for a Shift Supervisor or Operations Manager position will have gained knowledge in applied psychology, verbal and written communication, utility economics, labor relations, production management, and leadership through company training programs and on-the-job experience.

This broadening is a natural result of moving up through an organizational hierarchy and also becomes a prerequisite for promotion in any competent organization.

Also, this degree requirement imposes a significant disincentive for plant operations in the industry.



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Acknowledged by card... *2/5/81*

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Historically, most plant operators have Navy nuclear experience. A viable promotion path has always existed for these operators, even though they typically possess no more formal education than an Associates Degree or a high school education. If these operators can go no higher than first line supervisor, they will seek out other disciplines and other industries that desire to utilize their Navy training experience. Turnover of existing plant operators would likely be so large as to have a negative impact on safety. This is unavoidable as long as the promotional opportunities are no better than they are in the military.

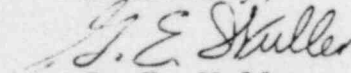
There are many areas in this country, typically rural where nuclear power plants are sited, where it is not possible to pursue an engineering or science degree, even part-time. Utilities can be expected to provide college level technical training for operating personnel, but providing a full degree program contains time, manpower, and economic costs that far outweigh the meager benefits. It is also very unlikely that college graduates will want to work or would be satisfied working as operators. Without operators where will the experienced supervisors come from to operate utility plants safely in the future?

In summary, the requirement for Shift Supervisors and Operations Managers to possess a Bachelor's Degree represents a constraint that could ensure that the quality people necessary to safely operate nuclear power plants, who only lack a Bachelor's Degree, are not available. Due consideration must be given to other factors demonstrating ability and experience.

The guide requires that simulator instructors be SRO licensed on the facility for which the simulator was designed. This is not practicable for plants under construction. This could also discourage a plant under construction from procuring a plant unique simulator. NRC approved simulator certification should suffice until license examinations are conducted at a plant just prior to receipt of an operating license.

The requirements for an effective training program should result from an analysis of the job to be performed. Setting arbitrary requirements (e.g. 60 semester hour requirement) prevents a realistic definition of the training needs from being performed.

Sincerely,



G. E. Wuller
Supervisor - Licensing
Nuclear Station Engineering

TFP/em

cc: E. P. Wilkinson, INPO
H. H. Livermore, NRC