



RECORDED & INDEXED *miscellaneous Reg Guide*

ARKANSAS POWER & LIGHT COMPANY
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February 10, 1981

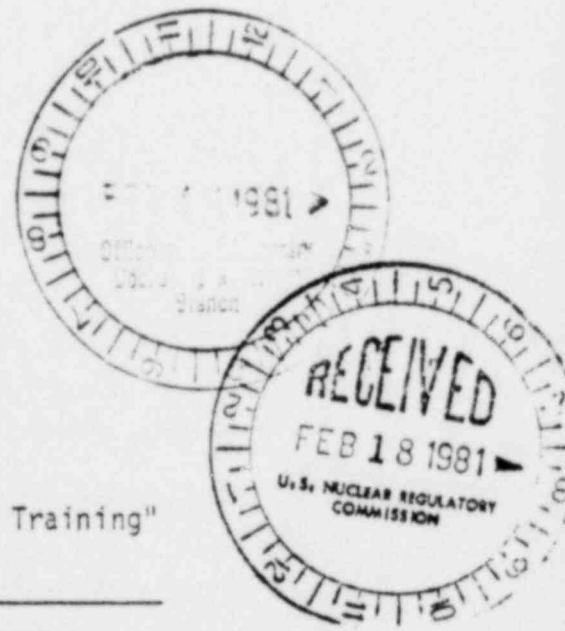
GR-0281-02

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

Attention: Docketing and Service Branch

Subject: Draft Regulatory Guide 1.8
Second Proposed Revision 2
"Personnel Qualification and Training"
Clarification of Comments
(File: 0523)

Ref: AP&L Letter of January 29, 1981,
David C. Trimble to Secretary of the Commission



Gentlemen:

In the referenced letter, AP&L provided comments on the subject Regulatory Guide. Since that letter was transmitted, it has come to our attention that one of our comments may have been misleading and that one additional comment was omitted from the letter.

The comment requiring clarification is our comment 3 on Part B (Discussion) which addresses the composition and experience requirements for the proposed onsite "Independent Safety Engineering Group". While we suggested a staffing level and experience requirement in our comment, we did not intend to imply that we support the need for this group. To the contrary, we feel that this group is not needed because the intended functions are provided by other sections of our plant staff. Specifically, our Arkansas Nuclear One organization includes a full-time Operations Experience Assessment group and a full-time Special Projects group in addition to the normal Plant Safety Committee and Plant Engineering functions. The addition of another independent group would only duplicate functions already provided by these groups.

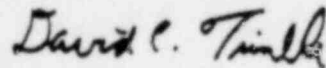
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Comments*

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The additional comment we wish to provide pertains to Section 2.2.1 on page 14 of the draft guide. We do not agree with the requirement for certification by the NRC or any other group for the positions of plant manager and technical manager. Personnel in such senior plant management positions are selected based on their qualifications, experience and performance and do not need to be subjected to additional certification by the NRC.

We hope that the above comments will be addressed along with our previous comments in further revisions to this Regulatory Guide.

Very truly yours,



David C. Trimble
Manager, Licensing

DCT:tw