

AMERICAN ELECTRIC POWER Service Corporation



2 Broadway, New York, N. Y. 10004
(212) 440-9000

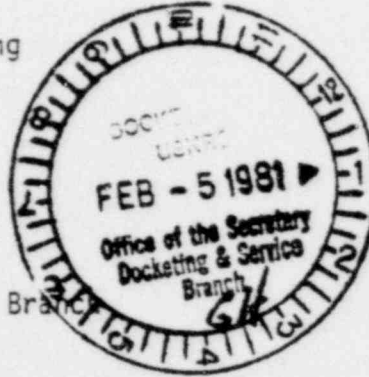
DATE NUMBER
PROPOSED RULE PR *misc notice*
Reg Guide

Personnel Qualification and Training

January 29, 1981

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

Attention: Docketing and Services Branch



Dear Mr. Chilk:

We are pleased to comment on the "Second Proposed Revision 2" to Regulatory Guide 1.8. This document, if issued in its present version, could have a severe impact on nuclear power plant operations.

General

1. The revision to the proposed Regulatory Guide should incorporate directly, not by reference, the words NRC finds acceptable from the draft ANSI/ANS 3.1. More importantly the NRC offers no justification of why ANSI/ANS 3.1 standard is unacceptable as written. A Regulatory Position that takes exception to a standard which may be acceptable to the industry on the whole deserves an explanation as to the reasons.

Specific Comments

1.2.1 Use of Temporary Replacements

The draft Regulatory Guide proposes one month as the maximum period of use for temporary replacements. We believe that the length of time allowed by the ANSI/ANS 3.1 standard, i.e. three months, is based on the potential of a trained individual becoming ill or temporarily disabled (by a broken arm or leg for instance) which could normally mean an expected furlough of about three months; and since these types of personal accidents are a reality, a period of three months does not seem unreasonably long. Furthermore, it is not unusual for an employee who suffers from a more serious illness to return to work after periods of six months or longer. We agree that temporary replacements should have some experience in the field of the individual whom they are replacing, but we do not agree with the NRC regarding the time interval chosen.

Acknowledges, J. C. ... *2/5/81*

HP 11

8103180 *986*

1.2.2 General Employment Training

The Regulatory Guide provides no justification for the classification of any contractor employee performing "contracted services" as an individual hired to temporarily function as a "plant employee." This would require the contractor employee to receive General Employment Training, as if he/she were a licensee employee, and would further require "evidence of previous education, experience, and training" which would necessitate a background screening check and extensive documentation and review of every contractor employee's employment history and other personal information. This is already required to a certain extent by security practices, but if a technical review of the "evidence" must be made for such "temporary personnel" the NRC would be needlessly increasing the work required by a licensee in obtaining the needed manpower. The requirement further begs the question as to what "evidence" is acceptable, how it and the review should be conducted and/or documented, and what kind of records must be kept and for what length of time?

1.3 "College Level Education" Definition

The staff position that, "This term should be construed to mean course work satisfactorily completed at or conducted by a college or university with curricula accredited by... (ABET/ECPD)." is not the same definition as that intended for use in the nuclear power industry. Rather, the ANSI standard definition of "related technical training" is deemed acceptable, in that, such advanced training may be conducted by the licensee's training organization in a program that provides the required "job-related" education needed for particular positions afforded by working in a nuclear power plant. Furthermore, "college level" training given by a licensee to its employees need not be dependent upon or specified in terms of "semester-hours" related to college level course work given at accredited educational institutions. The definition of education time in terms of "semester-hours" makes the assumption that every person can learn a specific subject matter in the specified number of hours. This does not take into account prior experience and "on-the-job" training factored into a licensee's training program which can be flexible enough to allow for slow-learners as well as advanced students.

1.4 Interim Regulatory Positions

- a) We find no justification in the guide for an extension of the experience requirement from six months to one year for an operator wishing to take a senior reactor operator's license examination. We believe that the ANSI/ANS 3.1 requirement under Section 3.4.1 is adequate.

- c) In the Regulatory Guide, the staff takes exception to Section 4.3.1.2 of the ANSI/ANS 3.1 standard where the educational requirements for a senior reactor operator are given as a high school diploma and the equivalent of thirty (30) semester hours of college level education, meaning 450 class-room or instructor-conducted hours of work in specific subjects. The staff has not provided adequate justification for raising the requirements of the ANSI/ANS 3.1 standard from 30 semester hours to 60 semester hours in the proposed guide. We believe the staff should survey the adequacy of licensee training programs and judge the results based on a case by case analysis of each training program. Furthermore, as discussed above, an individual's competency should not be based on the number of "college level" or class-room hours involved in study, but rather by the results seen in properly designed NRC licensing examinations.

2.1 Exceptions to Required Qualification

Section 4.1 of the ANSI/ANS 3.1 standard provides for a case by case evaluation of an individual's qualifications if the individual does not meet the requirements of the standard. However, Regulatory Position 2.1 places an upper limit of 5% on the number of such cases for positions covered by the Regulatory Guide. We believe the 5% limit is unjustified and that there should either be no limit or that the limit be a minimum of 50% of the positions covered, prior to NRC approval being required. Clearly, your own rationale points out the danger to safe operation of the plant if a high turnover results from the application of the Regulatory Guide. Furthermore, a "grandfather" clause should be included in the Regulatory Guide for those "positions" where exceptions should not be taken.

2.2.2 Maintenance: Educational Requirements

We disagree with the staff that the Maintenance Manager be required in the Regulatory Guide to have specific knowledge in the areas only recommended in the standard. At many plants, specific knowledge in the recommended areas may be held by other individuals employed by the licensee and, therefore, not required by this particular manager because it is available from others within the organization.

2.3 Shift Supervisors

Section 4.3.1.1 of the standard specifies the educational requirements of the Shift Supervisor as a high school diploma, plus the equivalence of sixty (60) semester hours of college level education, i.e. 900 class-room or instructor-conducted hours in specified subject areas. The regulatory position as stated in

January 29, 1981

this draft Regulatory Guide would require the Shift Supervisor to hold a Bachelor of Science degree. We firmly believe that this is an untenable position which jeopardizes the safe operation of nuclear plants since we anticipate that the use of college graduates in this position requiring rotating shift work would be difficult to implement and would result in an extremely high turnover rate, eventually resulting in a less experienced staff.

Furthermore, we believe this upgrade in the selection criteria for Shift Supervisors, via the specific educational qualification requirements dictated by the Regulatory Guide, could be a violation of EEOC guidelines and Affirmative Action Programs currently in existence. Clearly, the NRC has not conducted a validation study to show that this change in the requirements will not adversely impact minority groups and women. In addition, we strongly believe that the job of Shift Supervisor does not call for increased educational background beyond the standard.

With respect to Appendix A of the draft revision commenting on the proposed Regulatory Position 2.3.1 on Education Requirements for Shift Supervisor, we fully concur with the quoted statements made by the ACRS and AIF Working Group on Action Plan Priorities and Resources, while we take exception with those statements made by the consultants BETA, Inc. and Teknekum Research, Inc.

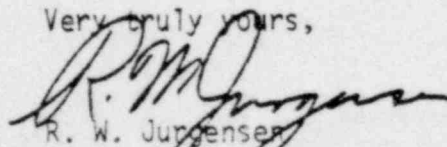
2.4.1 I&C and Chemistry and Radiochemistry Experience Requirements

The proposed Regulatory Guide states that Sections 4.4.2 and 4.4.3 of the standard should require "four years of professional-level experience" of which two years would be in the required field. There appears to be no justification for the additional requirement of adding two more years of professional-level experience, making it more restrictive than the standard. The strict compliance with the four year criteria would eliminate a large body of resources in an already tight market for such talents.

2.7 STA: Training

Appendix B to the Regulatory Guide poses many questions as to the adequacy and justification of additional training. For instance, we do not understand why the NRC believes that one year may be required in order to adequately train an individual in "Transient and Accident Response." We have found that specific training programs given by Westinghouse and other organizations using simulators can provide this training in programs of much shorter length. Further clarification and justification of this situation should be provided by the staff before the final issuance of this guide.

Very truly yours,



R. W. Jorgensen
Assistant Vice President and
Chief Nuclear Engineer

RWJ:clb

cc: (attached)

Mr. Samuel J. Chilk, Secretary -5-

January 29, 1981

cc: John E. Dolan
R. S. Hunter
D. V. Shaller - Bridgman
E. P. Wilkinson - INPO
F. Noon - Westinghouse