

RS 807-5

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

January 30, 1981



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

~~ADDED NUMBER~~ ~~RECORDED RULE~~ PR *misc notice*
Reg Guide

Attention: Docketing and Service Branch

Dear Sir:

In accordance with provisions for public review and comment indicated in the Federal Register on January 17, 1979, the Tennessee Valley Authority (TVA) is pleased to provide the enclosed comments on the following draft regulatory guide:

Draft Regulatory Guide 1.8
Revision 2

"Personnel Qualification
and Training"

Since the content and interpretation of regulatory guides have a large impact on TVA's extensive nuclear commitment, we welcome the opportunity for review and comment. TVA comments on additional regulatory guides will be forthcoming as a part of a continuing program.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills
L. M. Mills, Manager
Nuclear Regulation and Safety



Enclosure
cc (Enclosure):

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U.S. Nuclear Regulatory Commission
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Enclosure

TVA's Comments on Draft Regulatory Guide 1.8

1. 2.2.2 Recommended Revisions to Part 55 and 50, Page 6

- (a) We believe these changes should include provisions for the reexamination of persons who do not complete the examination within the required time limit, but who otherwise do well on those portions completed. Also, the changes should discuss what additional training is required and the required time before reexamination.

- (c) We suggest the person who administers the examination should meet the same requirements as required of the applicant (i.e., education, experience, and hold an SRO license on the facility which the examination is being given on).

- (d) We believe auditing of the examination by NRC is the most credible method.

2. C. Regulatory Position, Page 10, last sentence

We believe the wording (" . . . should be considered with those positions.)" is confusing. NRC should either state positively that Appendix A and Appendix B are an expansion of Regulatory Positions 2.3.1 and 2.7, respectively, and are a part of the position or the appendices should be deleted.

3. 1.2.1 Field-Specific Experience, Page 11

We disagree strongly with the sentence, "Temporary personnel should. . . exceeding 1 month." We believe it should be deleted. (The draft ANS 3.1 standard states three months.) With the industry continuing to experience a shortage of manpower, especially for qualified personnel, it is expected people will continue to move up either in their own organizations or in others. This creates unanticipated vacancies which require time to fill with the best qualified people. One month is not enough time in most cases to find, hire, or transfer a qualified replacement.

4. 1.4 Interim Regulatory Position Related To Anticipated Rules, Page 13, (b)

We believe the phrase, "or by the organization that operates the plant," needs a specific definition otherwise it should be deleted. For example, an individual associated with plant operations (Office of Power) may be transferred from the plant and still be employed by the organization (Office of Power) that operates the plant. We believe documentation need not be retained for such a person. This also applies to Section 2.1, Page 14 and Section 2.3.2, Page 16.

5. 2.2.2 Maintenance: Education Requirements, Page 15

We believe, based on the practice of nondestructive examination (NDE) work being performed by an independent group (normally quality assurance/quality control (QA/QC)) it is unnecessary for this individual to have nondestructive testing familiarity.

6. 3. Appendix A, Alternative Education Requirement

We believe alternative 3 is the most desirable because a strong operating crew is the solution. A well trained crew consisting of unlicensed operators, control room operators (RO's), shift foreman (SRO), shift supervisor (SRO), and shift technical advisors (ex-operator-SRO) can adequately handle normal, abnormal, and emergency situations.

7. Recommendations

We believe the emphasis should be on the well trained crew of operators instead of a "Shift Engineer." The reactor operator is the person who must execute corrective actions immediately when safety systems fail and in unusual situations. Most serious problems are corrected by quick operator actions. The reactor operator must be capable of doing this.

A person acting as a technically qualified observer of plant operations may not be available or capable of any assistance during the beginning of an accident. This person probably would be of significant value on a long term basis if the accident was protracted.